

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**DECLARATION OF R. MARTIN WEBER, JR. IN SUPPORT
OF CLASS COUNSEL'S UNOPPOSED APPLICATION FOR ATTORNEYS' FEES
AND EXPENSES AND CLASS REPRESENTATIVES'
UNOPPOSED APPLICATION FOR ENHANCEMENT AWARD**

I, R. Martin Weber, Jr., declare as follows:

1. I am an individual over the age of 18. I am a member of Crowley Norman LLP, a law firm based in Houston. I am Lead Counsel of Record, and Class Counsel, for the Plaintiffs and the Class. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently. I submit this declaration in support of CLASS COUNSELS' UNOPPOSED APPLICATION FOR ATTORNEYS' FEES AND EXPENSES AND CLASS REPRESENTATIVES' UNOPPOSED APPLCIATION FOR ENHANCEMENT AWARD.

2. For the reasons discussed herein, it is my opinion that the Court should award the full amount of the requested attorneys' fees (\$1,675,000), the full amount of the requested expenses (\$182,833.97), and the full amount of the requested Class Representative enhancements (\$30,000).

Personal and Professional Background

3. As detailed in this declaration as well as the declaration of my co-counsel, Class Counsel has a great deal of experience in class actions. Class counsel have cumulatively been certified and approved as class counsel in numerous other class actions and are currently litigating many others.

a. I received a B.A. in Political Science from Texas A&M University in 1991. I received a J.D. in 1994 from the University of Houston Law Center. Upon graduation from the University of Houston Law Center, I worked at Liddell, Sapp, Zivley, Hill & LaBoon, LLP, in Houston, practicing primarily in the area of personal injury defense and

commercial litigation from 1994-1998. From 1998 to 2007, I was an attorney at Davis & Davis, where I practiced in the areas of commercial litigation, wrongful death and catastrophic injury, and class actions. I have continued the same practice areas since 2007 at the firm of Crowley Norman LLP (formerly Crowley, Douglas & Norman, LLP).

b. I am a member of the Texas bar (1994). I have been admitted to the U.S. District Courts for the Northern, Southern, Western and Eastern Districts of Texas, the United States District Court for the Eastern and Western Districts of Arkansas, as well as the Fifth Circuit Court of Appeals. I am a member of the Houston Trial Lawyers Association; the Texas Trial Lawyers Association; and the Bar Association of the Fifth Federal Circuit.

c. I have been admitted pro hac vice to the United States District Court for the Northern District of Alabama; the United States District Court for the Western District of Oklahoma; the United States District Court for the Western District of Pennsylvania; the United States District Court for the Central District of California; the United States District Court of New Jersey; the United States District Court of Arizona; the United States District Court for the Southern District of Illinois; the District Court of St. Claire County, Illinois; the Circuit Court of Miller County, Arkansas; the Superior Court of Alameda County, California; the Superior Court for Los Angeles County, California; the Circuit Court of Palm Beach County, Florida; and the District Court of Carter County, Oklahoma. A copy of my personal resume and the law firm resume is attached as **Exhibit 1**.

d. I have experience in consumer class action and labor law class actions, commercial litigation, and wrongful death and catastrophic injury litigation. A sampling of these class action cases includes:

- i. I served as co-lead counsel in a California Labor Code lawsuit on behalf of a class of California salespeople. The case was filed and litigated in federal court in California styled Case No. 2:10-cv-05279; *Lang v. NCH Corporation*; in the United States District Court, Central District of California (Judge Dolly Gee). The case was settled as a class action and received final approval in January 2012.
- ii. I served as co-lead counsel for the plaintiffs in a Fair Labor Standards Act collective action that was litigated in federal court in the Northern District of Texas, styled Case No. 3:10-cv-00142; *Spence, et al. v. Irving Holdings, Inc.*; United States District Court, Central District of Texas (Judge Royal Furgeson). The case was settled as a collective action on behalf of a class of drivers and received approval in August 2011.
- iii. I served as co-lead counsel for a certified nationwide class regarding Fair Credit Reporting Act violations that was litigated in federal court in Oklahoma, styled Case No. 5:03-cv-00158; *Mobbs, et al. v. Farmers Ins. Co., Inc., et al.*; United States District Court, Western District of Oklahoma (Judge Stephen Friot). The case was settled as a nationwide

class action on behalf of over 2 million consumers, and received final approval on September 29, 2011.

- iv. I served as counsel in a nationwide consumer class action regarding a defect in automobiles, styled Cause No. 2:08-cv-04825-KSH-PS; *Alin, et al. v. Honda Motor Company, Ltd., et al.*; in the United States District Court, District of New Jersey (Judge Katharine S. Hayden). The case was settled as a nationwide class action and received final approval on April 12, 2012.
- v. I serve as counsel in a nationwide class action filed in Los Angeles superior court, styled Case No. BC300142; *Fogel v. Farmers Group, Inc., et al.*; Superior Court for the State of California, for the County of Los Angeles (Judge William Highberger). The case was settled and received final approval in December 2011. It is presently on appeal.
- vi. I was co-counsel in *George Collins, et al. v. Allstate Insurance Company, et al.*; Cause No. GN200820, in the 53rd Judicial District Court of Travis County, Texas, a Texas-wide class action filed against various Allstate entities involving allegations that Allstate Insurance Company engaged in unfair discrimination by virtue of its credit scoring practices, which was settled in 2005.
- vii. I am co-counsel in Farmers Texas credit scoring litigation which includes; (a) Cause No. GV 202501; *The State of Texas and The Texas Commissioner of Insurance v. Farmers Group, Inc., et al.*; In the 261st Judicial District Court of Travis County, Texas; (b) Cause No. GN 203156; *Farmers Insurance Exchange, et al. v. Jose Montemayor, et al.*; In the 353rd Judicial District Court of Travis County, Texas; (c) Cause No. CN0-01347; *Gilberto Villanueva, et al. v. Texas Farmers Insurance Company, et al.*; In the 53rd Judicial District Court of Travis County, Texas; (d) Cause No. GN2-00207; *Michael Paladino, et al. v. Mid-Century Insurance Company of Texas, et al.*; In the 250th Judicial District Court of Travis County, Texas; (e) Cause No. GN2-00208; *Michael Paladino, et al. v. Farmers Insurance Exchange, et al.*; In the 261st Judicial District Court of Travis County, Texas.
- viii. I served as counsel in a nationwide class action involving a manufactured home company; case was settled in Arkansas state court.
- ix. I served as class counsel in a nationwide class action case involving alleged elevator design and manufacturing defect; case was settled as a class action in state court in California.

This case has been fully and aggressively pursued

4. Class Counsel has prosecuted this case since February 2007. This case has been aggressively pursued at the district court level, and at the appellate court level. As this Court is well aware, the docket sheet in this case is 34 pages long, and contains 233 entries. *See Exhibit 2.* The Fifth Circuit docket sheet (**Exhibit 3**) similarly reflects the amount of time and effort expended by Class Counsel prosecuting this matter.

5. This lawsuit was originally filed on February 16, 2007. Plaintiffs alleged that Defendants¹ improperly increased the premiums charged to the participants in the Plan and improperly reduced benefits in violation of the Sterling Benefits Plan as amended by the Asset Purchase Agreement and in violation of the Employee Retirement Income Security Act of 1974 (“ERISA”), 29 U.S.C. § 1001 *et seq.*, forcing members to either pay the excessive premiums demanded by Defendants or to leave the Plan and seek out alternative health insurance and/or pay out of pocket for healthcare. Defendants contested these allegations, filing both a motion to dismiss and a motion for summary judgment.

6. On November 19, 2008, the Court granted a contested Motion for Class Certification, certifying the class under FED. R. Civ. P. 23(b)(1) and 23(b)(2).

7. With leave of Court, Plaintiffs filed a Fourth Amended Complaint. The Fourth Amended Complaint was the live pleading at the time the case was ultimately tried.

8. On May 20, 2009, the parties filed an Agreed Motion to Bifurcate Issues, urging that the Court bifurcate liability and damages, which the Court granted. All the liability issues were subsequently tried to the Court in November, 2009. Following significant post-trial briefing, the Court rendered judgment for the Defendants on July 1, 2010.

9. The Class Representatives appealed the adverse judgment to the Fifth Circuit. Following briefing and oral argument, on October 13, 2011 the Fifth Circuit reversed the judgment, and rendered judgment for the Plaintiffs and the Class. The parties thereafter returned to this Court for development of the damage issues in the case. Concurrently, the Defendants filed a petition for a writ of certiorari in the United States Supreme Court, which was denied on March 19, 2012.

10. Despite the adverse liability finding, it was clear that the Defendants intended to hotly contest the remaining damage issues in the case. The Class Representatives requested that the Court appoint a Special Master to determine the damages in the case and filed a motion for

¹The defendants named in the lawsuit are Sterling Chemicals, Inc. (“Sterling Chemicals”), Sterling Chemicals, Inc. Employee Benefits Plans Committee (“Committee”), Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, and Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees (the “Plans”). Eastman Chemical Company (“Eastman”) successor to Sterling Chemicals and the Committee, is the signatory to the Settlement. Collectively the parties are referred to herein as “Defendants.”

preliminary injunction. The Defendants opposed the request, and filed two motions for partial summary judgment on damage issues.

11. The Court granted the motion for Special Master on May 9, 2012, appointing David Axene as the Special Master. The Court also granted the motion for preliminary injunction. The Court held the motions for summary judgment pending a ruling by the Special Master.

12. The parties coordinated efforts providing the Special Master documents, and participated in a lengthy scheduling call with the Special Master.

13. In addition to motion practice, discovery regarding damage matters progressed. Written discovery was propounded, responses traded, experts retained, and expert reports prepared and produced. In short, by all measures the parties were actively preparing the case for trial.

14. The Plaintiffs had previously retained Adam Reese as an expert in healthcare costs in order to assist in presenting the damage case. Mr. Reese was asked by Plaintiffs to evaluate the damage information produced by the various class members. Mr. Reese produced a comprehensive damage report that was tendered to the Defendants and to the Special Master. In addition, Plaintiffs had Mr. Reese evaluate a proposal made by Defendants regarding moving the Class onto the Eastman plan. Plaintiffs received an analysis of Mr. Reese's evaluation of the Sterling and the Eastman benefits.

15. On April 26, 2012, I took the deposition of the corporate representative of Eastman (the successor entity to Sterling Chemicals), Mr. Phil Belcher, and confirmed an analysis regarding the overcharges that were paid by the members of the Class. Class Counsel was able to confirm through that deposition a precise calculation of the overcharges resulting from the April 2003 increase in premiums. Class Counsel also contacted many members of the Class to gather the damage information provided to Mr. Reese. Through that process, Class Counsel was able to confirm the accuracy of the information on the overcharge spreadsheet. The spreadsheet was referred to by the parties as "Ex. C," and was attached as Exhibit 1 to the Memorandum of Understanding eventually executed between the parties.

Settlement Efforts

16. The case was unsuccessfully mediated in 2008 with Mr. Ira Jaffe; and additional informal settlement discussions in 2009 failed to produce a settlement.

17. Concurrently with preparing the case for trial, and working with the Special Master, the parties renewed settlement discussions.

18. On February 20, 2012, the parties attended a full-day mediation with Chris Nolland, a highly qualified mediator in Dallas, Texas who routinely handles complex litigation, including class actions. While a general settlement framework was developed, the parties were

still far apart in their positions. The parties continued to discuss resolution over the next four months.

19. In late April 2012, Plaintiffs were advised that the Defendants had secured certain consents from Cytec that, if upheld, would permit Defendants to charge whatever premiums they deemed appropriate, and, if they desired, to terminate retiree benefits for the Class. This development, fully briefed by Defendants in their Second Motion for Partial Summary Judgment (ECF No. 203), materially impacted the parties' respective bargaining positions in the negotiations. While Plaintiffs did not concede that the consents were valid, the potential risks to the Class associated with the prompted additional settlement discussions. The parties were able to return to active negotiations and craft a settlement accounting for the new paradigm.

20. The parties executed a comprehensive Memorandum of Understanding on June 20, 2012. The parties spent the next several weeks drafting and negotiating a comprehensive Stipulation of Settlement based on the Memorandum of Understanding, along with multiple exhibits to the Stipulation of Settlement.

21. From the inception of the litigation, Plaintiffs, through counsel, conducted an extensive investigation of the factual and legal allegations involved, including engaging in broad discovery, exchanging voluminous documents, records and other information, conducting a significant amount of legal research, interviewing current and former employees, presenting witnesses for deposition, conducting depositions, propounding and responding to discovery, extensive motion practice, trial, and subsequent appeals. This case has been thoroughly developed at every stage. Through these efforts Plaintiffs and Class Counsel are very versed in both the damage calculations and the litigation risks attendant to pursuing these matters further.

The Settlement Achieved for the Class

22. The settlement reached in this matter, as reflected in the Stipulation of Settlement and Release and First Addendum (collectively "Settlement," true and correct copies of which are attached as **Exhibit 1** to the July 23, 2012 Declaration of R. Martin Weber, submitted as part of the July 23, 2012 App. 15-83), is a fair, adequate, and reasonable resolution of the Plaintiffs' and the Class Members' claims.

23. The Settlement is the product of arm's length negotiations by capable, experienced attorneys. There was certainly no fraud or collusion; the parties have vigorously advocated opposing points of view on a multitude of issues since this case was filed in 2007, including competing motions for summary judgment, the battle over class certification, motions to compel, the trial on liability, the appeal to the Fifth Circuit of the liability finding, and competing motions over the scope and effect of the liability finding on the Class Members' rights under the retirement plans. We also utilized the services of a skilled mediator to assist in the process. The Settlement follows – and is undeniably the result of – vigorous advocacy of opposing viewpoints. That advocacy ultimately led to the necessity of all parties to make reasonable concessions to resolve the remaining issues in the case.

24. Although the Fifth Circuit decision resolved the liability questions in the case, the application of those liability findings to the remaining damage issues in the case was unclear. Additional factual and legal issues relevant to individual class members' claims were lending themselves to extending the already five year old litigation. We had identified a number of disputed questions of fact and law, including:

- Was a particular treatment or therapy for a particular class member reasonably medically necessary?
- Would a particular treatment or therapy have been covered under the Sterling plan?
- How should differing deductible schemes be valued?
- Is a particular Class Member entitled to the value of treatment that such class member had to forgo because they could no longer afford either the Sterling plan or replacement coverage?
- Was Sterling entitled to enforce the \$50,000 cap on post-65 benefits?
- Does the Court have the authority, under ERISA, to order the reinstatement of Class Members to the plans if such Class Members terminated coverage?

25. Resolving these matters of first impression would necessitate significant time and resources by both sides, a considerable amount of Court involvement, and possibly the assistance of expert witnesses. We knew from the history of the case that if we could not reach a Settlement, the remaining legal and factual issues would likely be hard fought and would likely result in additional appeals. The proposed Settlement eliminates these expenditures of time and resources.

26. While the Defendants conceded generally that past overcharges in premiums would need to be repaid, they disputed the scope of the overcharges, and Plaintiffs entitlement to pre-judgment interest on those amounts. Further, the Defendants contended that Cytec's consents would potentially impact the number of years of overcharges that they would need to reimburse. The Settlement accounts for this element of damages by securing the vast majority of the total damages available. Given the demographic of the Class – virtually all of whom are over 65 – it was the Class Representatives' expressed desire, as well as Class Counsels' desire, to conclude the litigation to immediately move this compensation into the hands of the Class.

27. Much more vigorously contested was the amount of damages that could be recovered, if any, for those Class Members who dropped Sterling coverage. We were already aware of many of the Defendants' arguments on damages, as expressed in a Motion for Partial Summary Judgment on the issue of damages, contending that the amounts that fall under the category that the parties have labeled "Additional Monetary Claims Portion of the Settlement" are "consequential damages" not recoverable as a matter of law under ERISA. (ECF Doc. 200). We certainly disagreed with this contention, but if this case were not settled, the losing party on this essentially binary issue would likely appeal the result. Such an appeal would be expensive and time-consuming to resolve, and would further delay recovery for the elderly members of the class. There is authority for the position that such Class Members would be entitled to neither the amount they paid for replacement coverage nor medical expenses incurred as a result of being without insurance. The Settlement accounts for this element of damages by securing a

fund of \$375,000 to repay these claims. By virtue of the fact that these were amounts paid by members of the class directly to either medical providers or insurers, the information regarding the value of these Additional Monetary Claims was exclusively in the possession of individual members of the Class and their healthcare providers. Consequently, Class Counsel, in response to formal discovery propounded by Defendants, contacted the Class Members and gathered relevant, responsive information— copies of medical records, copies of medical bills, copies of health insurance premium payment data, copies of bank statements, printouts from class members’ bookkeeping programs, copies of insurance policies – in order to arrive at the total amount of costs that each class member had paid or incurred over and above the excessive premium amounts that such class member had paid into the Sterling Plan. Class Counsel also had this information evaluated by their retained expert, Adam Reese. As a result of this process, Class Counsel was able to identify \$616,789.75 in damages that might arguably fall within the Additional Monetary Claims component of the settlement. Because of the damage defenses discussed above, we reached agreement on a sum that represented approximately 60% (or a 40% percent discount) of the Additional Monetary Claims that they were able to get Class Members to identify and report during the discovery process. It is my opinion that this reflects an appropriate risk-adjusted discount of the Additional Monetary Claims.

28. The Stipulation of Settlement secures future retiree medical and prescription drug benefits for the members of the Class. Under the present medical plan, Class Members age 65 and over are paying for benefits (which act as a supplement to Medicare), but the lifetime benefits are, per Sterling, capped at \$50,000. In fact, several Class Members, including Class Representative Hamilton, have already reached the \$50,000 cap and had their benefits terminated. This Settlement allows for even more valuable benefits to be reinstated. Moreover, there was a significant contested issue as to whether the Court could order benefits to be reinstated for those Class Members who dropped coverage. This Settlement resolves that dispute in favor of all Class Members.

29. Both Class Counsel, and the Class Representatives, believe that the Settlement should be approved by the Court. Based on those negotiations and a detailed knowledge of the issues present in this action, counsel for Plaintiff and the putative class was and is convinced that this settlement is in the best interest of the Class Members.

Terms of the Settlement

30. The negotiated terms of the Settlement for which Plaintiffs seek approval provide for future retiree benefits to be provided to the Class, as detailed in the Settlement and in my prior declaration; cash payments in the amount of \$2,687,166.03 to be made for past premium overcharges (Cost Differential Portion of Settlement), as detailed in the Settlement and in my prior declaration; and cash payments to be made for past excess out-of-pocket medical expenses or the cost for replacement insurance in the amount of \$375,000 (Additional Monetary Claims Portion of Settlement), as detailed in the Settlement and in my prior declaration.

31. The Settlement also provides for Class Representative Enhancement for the extensive time and effort placed into prosecuting this case, as well as the personal risk associated

with pursuing the claims. Defendants have agreed to pay the Class Representatives an enhancement award of \$30,000.00 (\$10,000.00 each), subject to Court approval.

32. The Settlement further provides for attorneys' fees and litigation expenses, as discussed in more detail below.

Opinions regarding Settlement

33. Counsel for Plaintiff balanced the terms of the proposed settlement, including both the settlement amount and benefits conferred on the Class Members by the settlement, against the probable outcome of and the range of recovery issues at trial; the risks of trial and other normal perils of litigation, including the defenses asserted by the Defendant; difficulties of complex litigation; lengthy process of establishing specific damages; and counsel for Plaintiff also carefully considered various possible delays and appeals in agreeing to the proposed settlement.

34. It is my opinion, based on documents reviewed, discovery completed, and consultations with experts that the Settlement provides for recovery of approximately 92% of the estimated actual damages of the Class, and also deals very favorably with how to deliver the maximum future retiree benefits fairly to all Class Members.

35. I have knowledge of the strengths and weaknesses of the case, which knowledge enables me to evaluate the fairness of the proposed Settlement herein. Based on the Plaintiff's counsel's own independent investigations and evaluation, I am of the opinion that the Settlement is fair, reasonable, and adequate and is in the best interests of the Class in light of all known facts and circumstances and the expenses and risks inherent in litigation and certification, including Defendant's dispute of the damage elements of the case.

Opinion Regarding Attorney Fee Award

36. As part of the Settlement, Defendants, subject to Court approval, have agreed to pay Class Counsel up to \$1,675,000 in attorneys' fee:

In consideration of Class Counsel's efforts in prosecuting this matter and obtaining this Settlement on behalf of the Class, and subject to final approval or modification by the Court, Defendants shall pay Class Counsel's fees up to the total sum of \$1,675,000.00 and costs up to the total sum of \$182,833.97, which sums will be paid by Defendants in addition to all other elements of consideration herein. Defendants agree not to object to Class Counsel's fee and cost application up to the specified amounts. The amounts will cover all work performed and all fees and costs incurred to date, and all work to be performed and all fees and costs to be incurred in connection with the approval by the Court of this Stipulation of Settlement, the administration of this Stipulation of Settlement, and obtaining entry of Final Judgment in this Action. Approved attorneys' fees and costs will be paid by Defendants directly to Class Counsel no more than 5 days following the Effective Date of the Settlement.

Settlement at ¶ 55.

37. Class Counsel have incurred significant time and expense prosecuting this matter over the last 5 ½ years. Presently, Class Counsel have a lodestar (hours x billable rate) of \$2,254,799.90. Each of the participating firms has presented to the Court in support of this application a declaration of the lead attorney establishing the reasonableness and necessity of their respective lodestar. I provide the following summary of the current lodestar of each of the participating Class Counsel firms for the Court's convenience:

Crowley Norman LLP	\$727,140.00
The Roper Firm, P.C.	\$801,161.15
Beck, Redden & Secrest, LLP	\$352,530.00
Gillespie, Rozen & Watsky, P.C.	\$373,968.75
TOTAL	\$2,254,799.90

38. Attached as **Exhibit 4** is a copy of my detailed time records for this matter.

39. My work in this case began before the matter was filed in February 2007. As reflected on the docket sheet and in the detailed time records, my firm performed a significant amount of work leading up to the Court granting certification of the class in November 2008. In its November 9, 2008 Memorandum Opinion and Order (Doc. 101), this Court appointed Walt Roper, Hal Gillespie, and myself as Class Counsel. My role as Class Counsel has been to serve as one of the three primary attorneys in the underlying litigation at the District Court level, and I have been actively involved in the prosecution of this matter on a day-to-day basis since it was filed in 2007. In this role, I was instrumental in the prosecution of the litigation, and over the course of the last five years I have engaged in countless communications with the Class Representatives, Defendants, and co-counsel, have taken depositions, interviewed potential witnesses, prepared the Class Representatives for deposition and trial, presented Class Representatives for deposition and at trial, performed legal research, reviewed and analyzed documents, assembled and drafted pleadings, briefed numerous issues related to liability and certification and damages, and drafted and responded to discovery, among other things.

40. From the inception of this litigation, Class Counsel have aggressively prosecuted this case and vigorously represented the best interests of Plaintiffs and the Class. Class Counsel are skilled and experienced in complex litigation, including consumer actions and class actions. The skills and experience of the law firms handling the case for the Plaintiffs complimented one another and allowed us to efficiently and aggressively pursue the present litigation. Every reasonable effort was made not to duplicate work product and to enhance the efficient prosecution of this litigation. In fact, Class Counsel had every reason and incentive to avoid extra, unnecessary or duplicative work.

41. As reflected in my time records, to date I have expended 1,211.9 hours working on this matter. These hours were reasonable and necessary given the history of this case and the efforts on behalf of the class taken by me in this matter. I know that this total will increase given the work that remains in this case as there will be additional work with class members in regard to claims, final approval briefing, and participation in final fairness hearing. I reasonably

anticipate an additional 45 hours will be expended on this matter, bringing the total number of hours to 1,256.9. As discussed below, I have charged the hourly rate of \$600, which I believe is usual and customary rate for the work performed. Accordingly, my current lodestar is \$727,140.00. I believe this amount is reasonable and should be awarded. The lodestar is reasonable under the factors used by the federal and state courts in Texas to determine and measure such matters.

42. In Texas and in federal courts in Texas, there are multiple factors to be considered in determining whether fee should be approved. I offer the following in regard to some of those factors:

a. **The time and labor required, the novelty and difficulty of the questions, and the skill required to perform the services properly.**

As reflected in the attached docket sheets and my time records, this matter took over five years and significant time and effort to conclude. The matters presented, which included complex ERISA, bankruptcy, and class actions questions, required extensive research, knowledge, training, and experience to adequately handle. These matters required not just the bankruptcy and class action expertise of my firm, but the ERISA and appellate knowledge and experience of my co-counsel. The collective skill and expertise of Class Counsel provided for the successful prosecution and proposed resolution of this matter, and unlikely could have been obtained with less skilled practitioners.

b. **The likelihood that the acceptance of this case precluded other employment.**

While difficult to quantify with specificity, Crowley Norman is a relatively small Plaintiffs' firm that is constrained in the number of cases that it can accept and prosecute at any given time. As a result, it is reasonable to conclude that the acceptance of the present case has, at least to some extent, precluded other employment opportunities by the firm.

c. **The fee customarily charged in the locality for similar legal services.**

I have regularly had the rate of \$600 per hour approved in class action matters in which I have worked and settled, which is a usual and customary rate for experienced class action attorneys in Texas and around the country who have been in practice for 18 years. I have recently had rates of \$600/hr. approved by courts in class action settlements, and I believe that \$600 an hour represents a reasonable rate for lawyers of like experience and certification. For example, on February 1, 2011, in a class action settlement involving claims of defectively-designed elevators, Judge Steven A. Brick approved our attorney fee request of \$2,505,984.19. (Order Re Final Approval and Award of Attorneys' Fees, Expenses and

Incentive Award, *El Dorado Hospitality, LLC v. Thyssenkrupp Elevator Corp.*, Case No.: RG10507954; Superior Court of the State of California in and for the County of Alameda.) In connection with that award, my time was submitted and approved at a requested rate of \$600 per hour. Judge Brick, after a review of counsel's time affidavits and billing records, found that the proposed fee was "fair, reasonable, and not excessive in light of counsel's experience, qualifications, and the time and effort devoted to the case." I was designated as co-lead counsel in the MDL litigation styled *In re: Farmers Insurance Co., Inc., FCRA Litigation*; Western Dist. Case No. CN-03-158-F; MDL No. 1564; In the United States District Court for the Western District of Oklahoma. In September of 2011 Judge Stephen P. Friot approved an attorney fee and expense award of \$8 million. Although not specifically discussed in Judge Friot's Final Judgment, that fee award was based in part on a lodestar cross-check wherein my time was calculated and submitted at \$600 per hour. Finally, as recently as earlier this year, in a nationwide class action entitled *Alin v. Honda Motor Co.*, Civil Action No.: 2:08-cv-04825; United States District Court for the District of New Jersey, Judge Katherine S. Hayden approved a \$2,525,000 award of fees and expenses based, in part, upon an hourly rate of \$600 per hour for my work. In January 2012, Judge Dolly Gee, in No. 2:10-cv-05279; *Lang v. NCH Corporation*; in the United States District Court, Central District of California, approved a fee award in which my lodestar was submitted on the basis of \$600/hour.

I have also contacted counsel in Houston whose firm routinely handles matters of the complexity of this lawsuit. Rates in excess of \$600/hour are the published rates for complex litigation for attorneys of similar training and years of experience.

Based on this information, and my knowledge, training and experience handling complex litigation, it is my opinion that \$600/hour represents a rate that is customarily charged in Houston, Texas for complex, class action litigation by attorneys licensed in or around 1994.

d. **The amount involved and the result obtained.**

As described in other parts of this declaration, the litigation involved claims totaling millions of dollars, and requests for injunctive relief worth millions more. As described herein, the litigation produced an extraordinary recovery of well in excess of 90% of the estimated monetary damages, and future retiree benefits on a forward-looking basis worth hundreds of thousands per year to the retirees. The amount involved, and the result obtained, support the fee requested herein.

e. **The nature and length of the professional relationship.**

I have represented the clients in this matter for over five years in this matter.

f. **Experience, reputation, and ability of the lawyers performing the services.**

As described above, I have significant experience in class action litigation, and have been routinely approved as class counsel in matters in prosecuted in state and federal courts around the country.

g. **Whether the fee is fixed or contingent upon results obtained or uncertainly of collection before legal services have been rendered.**

This matter was prosecuted on a contingent fee basis, with counsel advancing not only their time but the expenses of the litigation. As a result, I would not—and am of the opinion that no adequately-qualified attorney would—have pursued this case hoping to succeed and recover no more in fees than might be earned on a non-contingent basis.

43. At the final fairness hearing Class Counsel will seek approval of an award not to exceed \$1,675,000.00 as compensation for attorney's fees. In order to obtain a Settlement, Class Counsel to agreed to accept an amount significantly less than their total accrued lodestar. The total accrued lodestar is \$2,254,799.90. Given that the attorneys' fees that will be requested in this matter is \$1,675,000, which results in a negative multiplier of .75 (or a 25% reduction), it is my opinion that the total fee request is fair and reasonable.

Opinion Regarding Application for Payment of Expenses

44. Class Counsel seek reimbursement, collectively, of costs and expenses in the amount of \$182,833.97.

45. My firm, to date, has incurred reasonable litigation expenses in the amount of \$63,622.39. An itemization of expenses (for my prior firm Crowley Douglas & Norman and my current firm Crowley Norman LLP) is attached as **Exhibit 5**. The expenses of all firms, as evidenced by the respective declarations, are summarized as follows:

Crowley Norman LLP	\$73,622.39
The Roper Firm, P.C.	\$58,232.05
Beck, Redden & Secrest, LLP	\$9,578.08
Gillespie, Rozen & Watsky, P.C.	\$36,075.69
TOTAL	\$177,508.21

46. By the time of the Final Hearing, in all likelihood Class Counsel will have incurred reasonable litigation expenses in the amount of at least \$6000.00 associated with travel for themselves and the Class Representatives. The total incurred will, in all likelihood, slightly exceed the requested amount.

47. It is my opinion that the recovery in this case could not have been obtained absent Class Counsel advancing these expenses. I believe that the expense request of \$182,833.97 is fair and reasonable given the expenditures of counsel in this matter, and should be reimbursed per the parties' agreement.

Information Regarding Involvement of Class Representatives

48. I offer the following in regard to the efforts of the Class Representatives and in support of their request for an enhancement award:

a. Even before hiring the counsel in this case, the Class Representatives had retained and worked with other counsel to make demand on Sterling.

b. Class Representatives worked closely with Class Counsel in this matter, participating in numerous calls and meetings, and providing documents and document analysis on a regular basis.

c. The Class Representatives participated directly in the mediations, providing insight and analysis of claims and defenses that could not have been performed without the information they possessed from their time and experience with the company.

d. All Class Representatives live outside of Houston, and traveled to Houston for their depositions.

e. All Class Representatives live outside of Houston, and traveled to Houston for trial.

f. The Class Representatives had personal risk in pursuing this matter, as in the event of an adverse judgment in this case they might be potentially responsible for costs and attorneys fees.

g. The Class Representatives diligently and consistently fought to obtain a fair settlement for all Class Members.

Conclusion

49. Statement Pursuant to FRCP 23 and 54. Pursuant to Federal Rules of Civil Procedure 23(e) and 54 (d)(2)(iv), I state that all agreements in this litigation, including settlement agreements, have been filed herein and there are no agreements for services related to this cause or settlement that have not been disclosed to this Court.

50. In conclusion, Class Counsel requests a fee in the amount of \$1,675,000.00 and recoverable and necessary expenses award in the amount of \$182,833.97. This award is reasonable, necessary and just applicable and governing law.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 24rd day of August, 2012 in Houston, Texas.



R. MARTIN WEBER, JR.
DECLARANT

EXHIBIT 1

RONALD MARTIN WEBER, JR.

Crowley Norman, LLP
3 Riverway, Ste. 1775
Houston, Texas 77056
phone: 713-651-1771 *fax:* 713-651-1775

LICENSED TO PRACTICE

State of Texas, November 1994

Admitted to practice in all Texas state courts, as well as the United States District Courts for the Northern, Southern, Eastern and Western District of Texas, the United States District Court for the Eastern and Western Districts of Arkansas, and the Fifth Circuit Court of Appeals.

Admitted *pro hac vice* presently or currently to the United States District Court for the Northern District of Alabama; the Western District of Oklahoma; the Western District of Pennsylvania; the Central District of California; the United States District Court of New Jersey; the United States District Court of Arizona; the United States District Court for the Southern District of Illinois; the District Court of St. Claire County, Illinois; the Circuit Court of Miller County, Arkansas; the Superior Court of Alameda County, California; the Superior Court for Los Angeles County, California; the Circuit Court of Palm Beach County, Florida; and the District Court of Carter County, Oklahoma.

WORK EXPERIENCE

Crowley Norman LLP Houston, Texas

April 2007 to present

Trial attorney. Prosecution of consumer class action litigation, business tort and breach of contract cases, and personal injury litigation.

Davis & Davis, Attorneys at Law Houston, Texas

April 1998 to April 2007

Trial attorney. Prosecution and defense of business tort and breach of contract cases, personal injury cases, medical malpractice cases, and consumer class action litigation.

Liddell, Sapp, Zivley, Hill & LaBoon, L.L.P. Houston, Texas

August 1994 to April 1998

Litigation section. Defended personal injury claims, subrogation suits, coverage counseling and related litigation matters on behalf of primary and excess insurers and reinsurers in the United States domestic and London markets; defended personal injury claims and defended and prosecuted business tort and breach of contract cases on behalf of large, self-insured corporations.

EDUCATION**University of Houston Law Center**

Houston, Texas

J.D., May 1994, *cum laude*

Honors: University of Houston Law Review

Finalist, Hippard Mock Trial Tournament

Texas A&M University

College Station, Texas

B.A. Political Science, May 1991

Minor: Speech Communication

MEMBERSHIPS

State Bar of Texas

Houston Trial Lawyers Association

Texas Trial Lawyers Association

Bar Association of the Fifth Federal Circuit.

CROWLEY NORMAN LLP FIRM RESUME

Firm Overview

Crowley Norman LLP¹ was founded in Houston, Texas in 1990. The firm's practice is primarily concentrated in the areas of class actions and complex litigation; nursing home abuse litigation; automotive product liability; personal injury; wrongful death; general commercial; and civil trial law.

Crowley Norman LLP is dedicated to providing the highest quality legal representation to its clients. In doing so, the firm utilizes the latest advancements in technology and devotes the financial resources necessary to ensure the best possible results for its clients. The well-trained and experienced Crowley Norman LLP support staff enables the firm to vigorously prosecute complex civil actions and to derive maximum results in a timely and cost-effective manner.

Class Actions and Complex Litigation

The firm has successfully represented plaintiffs in class actions involving, among others, the marketing and sale of Inside Wire Maintenance Service to consumers; cancellation provisions in subscription contracts of cellular service providers; defective rear lift-gate latches in family minivans; Mexican money wire transfers; consumer rental late fees; and diminution in value of pick-up trucks as a result of defective side-saddle fuel tanks.

In addition, Crowley Norman LLP was one of several firms that represented a nationwide class of consumers of defective polybutylene plumbing pipe. That class action was successfully resolved through the creation of a nation-wide settlement fund worth more than \$1 billion.

Crowley Norman LLP currently represents the named plaintiffs and classes in class action and derivative litigation against, among others, Farmers Insurance Company, Chesapeake Energy Corp., GoDaddy.com, American Honda Motor Co., Isramco, Inc., Irving Holdings, Inc., Thyssenkrupp Elevator Corp., Ebby Halliday Real estate, Inc., and multiple multi-national insurance companies.

1 References to the law firm Crowley Norman LLP incorporate the predecessor firms Crowley Douglas & Norman, LLP; Crowley & Douglas, LLP; and Crowley, Marks & Douglas, LLP. All of the class action and derivative cases referenced herein are cases in which Richard Norman was counsel of record.

Significant Crowley Norman LLP Recoveries

- ❖ Industrial accident involving closed head injury to worker (\$1.3 million)
- ❖ Defective air bag system design of major automaker resulting in paralysis (Air bag I) (\$8.775 million)
- ❖ Defective air bag system design of major automaker resulting in partial paralysis (Air bag II) (\$8.775 million)
- ❖ Automobile accident against company and employee alleged to be within course and scope of employment (\$4.65 million)
- ❖ Defective fuel tank integrity case against major automaker alleged to have resulted in burn deaths of two young men (\$3 million)
- ❖ Children allegedly exposed to lead contamination emanating from a south Dallas lead smelter (\$18 million)
- ❖ Class action involving the marketing and sale of Inside Wire Maintenance Service to telephone service consumers (settlement valued at more than \$100 million)
- ❖ Class action involving cancellation provisions in subscription contracts of cellular service providers (settlement valued at more than \$10 million)
- ❖ Class action involving defective rear lift-gate latches in Chrysler minivans (settlement valued at more than \$115 million)
- ❖ Class action involving diminution in value to GMC pick-up trucks as a result of allegedly defective side-saddle fuel tanks (settlement valued at more than \$100 million)
- ❖ Class action involving manufacture and marketing of polybutylene plumbing pipe (creation of nation-wide settlement fund worth more than \$1 billion)
- ❖ Class action involving mismarketing of Mexican money transfer services (settlement valued at more than \$275 million)
- ❖ Class action involving late fees charged to members of Blockbuster (settlement valued at more than \$495 million)
- ❖ Nursing home neglect case involving resident who suffered pressure ulcers, malnutrition and dehydration resulting in death (\$2.8 million)
- ❖ Nursing home abuse case involving elderly, incompetent and incapacitated nursing home resident sexually assaulted by nursing home employee (\$2.2 million)

- ❖ Nursing home neglect case involving resident who suffered infected pressure ulcers, malnutrition, dehydration, and blood borne toxic infections resulting in death (\$1.625 million)
- ❖ Nursing home abuse case involving resident improperly restrained in bed resulting in death by strangulation. Nursing home attempts cover-up (\$1.5 million)
- ❖ Nursing home neglect case involving resident who suffered multiple infected pressure ulcers resulting in death (\$1 million)
- ❖ Nursing home neglect case involving resident who suffered massive, infected pressure ulcers resulting in death (\$940,000)
- ❖ Nursing home neglect case involving resident who suffered pressure ulcers, sepsis, MRSA (life threatening infection) resulting in death (\$850,000)
- ❖ Nursing home neglect case involving elderly resident who suffered multiple pressure ulcers, dehydration, contractures and septicemia resulting in death (\$825,000)
- ❖ Oil field gross negligence case against the employer (\$1.45 million)
- ❖ Child Molestation case at private boarding school (\$1.75 million)
- ❖ Oil field fall case (\$2 million)
- ❖ Intersection auto collision (\$7.5 million)
- ❖ Fatality resulting from tar truck explosion (\$2 million)
- ❖ Wrongful death against product supplier for negligent loading of decedent's trailer (\$1.25 million)
- ❖ Construction related fatalities relating to exposure to methane gas in a confined space (\$2 million)
- ❖ Fatality resulting from trench collapse (\$1.1 million)
- ❖ Automobile collision involving closed head injuries (\$1.3 million)
- ❖ Automobile accident resulting in impaired employment capability (\$5 million)
- ❖ Burn injuries relating to LP gas explosion (\$14.45 million)
- ❖ Burn injuries relating to heater-treater explosion (\$7.9 million)
- ❖ Head injury resulting from defective valve design (\$6.91 million)
- ❖ Murder and rape of hotel guest by hotel employee (\$4.5 million)

- ❖ Fatality resulting from tour bus and 18-wheeler collision (\$3.3 million)
- ❖ Fatality resulting from trench cave-in due to gross negligence and lack of safety at construction site (\$2.5 million)
- ❖ Product liability case involving paralysis due to automotive restraint defect (\$1.9 million)
- ❖ Personal injury case involving automobile/commercial pickup truck collision (\$1.5 million)
- ❖ Fatality due to oil field negligence (\$1.4 million)
- ❖ Burn injuries resulting from improper storage of flammable materials (\$1.2 million)
- ❖ Burn injuries resulting from oil field heater-treater explosion (\$1.2 million)
- ❖ Fatality due to oil field negligence (\$1.0 million)
- ❖ Fatality resulting from automobile/commercial pickup truck collision (\$1.0 million)

Attorney Biographies

TIMOTHY J. CROWLEY, Admitted to bar, 1983, Texas; 1990, Colorado; admitted to practice before U.S. Supreme Court; U.S. District Court, Southern and Eastern Districts of Texas; United States Court of Appeals for the 11th Circuit. Preparatory and legal education, Texas Tech University (B.A., 1976; J.D., magna cum laude, 1983). Board Certified, Personal Injury Trial Law, Texas Board of Legal Specialization. Order of the Coif. Editor-in-Chief, *Texas Tech Law Review*, 1982-1983. Pattern Jury Charge 3 Committee, 1990-1992. Chairman of District 4G Grievance Committee- Houston- State Bar of Texas, 1998-99. Co-author, *Class Action Lawsuits and Product Liability Litigation*, Texas Trial Lawyers Association Advanced Product Liability Seminar, Houston 1995; Co-author, *Pushing The Envelope Of Damages In Class Actions*, Houston Bar Association Damage Control Seminar, Houston 1997. Member: State Bar of Texas; American Bar Association; Texas Trial Lawyers Association (Associate Director, 1988; Director, 1988-present); The Association of Trial Lawyers of America.

RICHARD E. NORMAN, Admitted to bar, 1993, Texas; also admitted to practice before U.S. District Court, Eastern, Western, Northern and Southern Districts of Texas; U.S. District Court, Eastern and Western Districts of Arkansas; United States Court of Appeals for the 5th, 8th, 9th and 11th Circuit. Preparatory and legal education, University of Florida (B.A., 1990); Baylor University (J.D., 1993). Baylor Order of the Barristers. Co-author, *Class Action Lawsuits and Product Liability Litigation*, Texas Trial Lawyers Association Advanced Product Liability Seminar, Houston 1995; Co-author, *Pushing The Envelope Of Damages In Class Actions*, Houston Bar Association Damage Control Seminar, Houston 1997; Co-author, *Standing Of Unnamed Class Members To Appeal A Trial Court's Approval of a Class Action Settlement*, Class Actions and Derivative Suits, Spring 1998. Member of District 4A Grievance Committee- Houston- State Bar of Texas, 2000-2006. Board Member, The River Performing and Visual Arts Center (1999-2010). Board Member, Texas Trial Lawyers Association (2007-2009). Fellow, Texas Bar Foundation (2007-present). Member: State Bar of Texas; American Bar Association; Houston Trial Lawyers Association;

America Association of Justice.

R. MARTIN WEBER, JR., Admitted to bar, 1994, Texas; also admitted to practice before U.S. District Court, Southern and Western Districts of Texas; Eastern and Western Districts of Arkansas; and the 5th Circuit Court of Appeals. Preparatory education, Texas A&M University (B.A., Political Science, 1991); legal education, University of Houston Law Center (J.D., cum laude, 1994).

CHRIS CESSAC, Admitted to bar, 1992, Texas. Preparatory and legal education, Texas A&M University (B.A., 1990); University of Michigan Law School (J.D., 1992). Barristers Society. Johns Hopkins University (M.A. 1999). Instructor, Johns Hopkins University (1998-99). People's Law School (1995-96). Member: Inn of Court; State Bar of Texas; State Bar Appellate Section; Texas Trial Lawyers Association; Texas Young Lawyers Association; The Association of Trial Lawyers of America; Legal Services for Low-Income Texans (1994-95).

EXHIBIT 2

SM

**U.S. District Court
SOUTHERN DISTRICT OF TEXAS (Houston)
CIVIL DOCKET FOR CASE #: 4:07-cv-00625**

Evans et al v. Sterling Chemicals, et al
Assigned to: Judge Kenneth M. Hoyt
Cause: 29:1001 E.R.I.S.A.: Employee Retirement

Date Filed: 02/16/2007
Jury Demand: Plaintiff
Nature of Suit: 791 Labor: E.R.I.S.A.
Jurisdiction: Federal Question

Plaintiff

Robert E Evans

represented by **Ronald Martin Weber , Jr**
Crowley Norman LLP
Three Riverway
Suite 1775
Houston, TX 77056
713-651-1771
Fax: 713-651-1775
Email: mweber@crowleynorman.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Christa J Boyd Nafstad
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214-720-2009 ext 139
Fax: 214-720-2291 fax
ATTORNEY TO BE NOTICED

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Gillespie Rozen et al
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TERMINATED: 10/29/2008
ATTORNEY TO BE NOTICED

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Beck Redden Secrest LLP
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ATTORNEY TO BE NOTICED

Plaintiff

Relmond H Hamilton

represented by **Ronald Martin Weber , Jr**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Hal K Gillespie
(See above for address)
ATTORNEY TO BE NOTICED

Karla S Jackson
(See above for address)
TERMINATED: 10/29/2008
ATTORNEY TO BE NOTICED

Russell Stanley Post
(See above for address)
ATTORNEY TO BE NOTICED

Walter D Roper
(See above for address)
ATTORNEY TO BE NOTICED

Plaintiff

Dennis Harthun

represented by **Ronald Martin Weber , Jr**

(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Hal K Gillespie
(See above for address)
ATTORNEY TO BE NOTICED

Karla S Jackson
(See above for address)
TERMINATED: 10/29/2008
ATTORNEY TO BE NOTICED

Russell Stanley Post
(See above for address)
ATTORNEY TO BE NOTICED

Walter D Roper
(See above for address)
ATTORNEY TO BE NOTICED

V.

Defendant

Sterling Chemicals Inc
Individually and as successor-in-interest to Sterling Chemicals Holdings Inc

represented by **Kelley Riddle Edwards**
Littler Mendelson PC
1301 McKinney
Ste 1900
Houston, TX 77010
713-652-4702
Fax: 713-951-9212
Email: kedwards@littler.com
TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED

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1301 McKinney
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ATTORNEY TO BE NOTICED

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713-652-4782
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ATTORNEY TO BE NOTICED

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Ste 1900
Houston, TX 77010
713-652-4737
Fax: 713-951-9212
Email: smoll@littler.com
TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED

Defendant

Sterling Chemicals Inc Employee Benefits Plans Committee
in its Capacity as Plan Administrator of the Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees and the Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees

represented by **Kelley Riddle Edwards**
(See above for address)
TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED

Kerry E Notestine
(See above for address)
ATTORNEY TO BE NOTICED

Nitin Sud
(See above for address)
TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED

Sarah Beth Morton
(See above for address)
ATTORNEY TO BE NOTICED

Stefanie R Moll
(See above for address)
TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED

Defendant**Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees**represented by **Kelley Riddle Edwards**
(See above for address)
TERMINATED: 05/17/2012
*ATTORNEY TO BE NOTICED***Kerry E Notestine**
(See above for address)
*ATTORNEY TO BE NOTICED***Nitin Sud**
(See above for address)
TERMINATED: 05/17/2012
*ATTORNEY TO BE NOTICED***Stefanie R Moll**
(See above for address)
TERMINATED: 05/17/2012
*ATTORNEY TO BE NOTICED***Defendant****Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees**represented by **Kelley Riddle Edwards**
(See above for address)
TERMINATED: 05/17/2012
*ATTORNEY TO BE NOTICED***Kerry E Notestine**
(See above for address)
*ATTORNEY TO BE NOTICED***Nitin Sud**
(See above for address)
TERMINATED: 05/17/2012
*ATTORNEY TO BE NOTICED***Stefanie R Moll**
(See above for address)
TERMINATED: 05/17/2012
*ATTORNEY TO BE NOTICED***Defendant****Sterling Fibers Inc**
*TERMINATED: 06/05/2007*represented by **Kelley Riddle Edwards**
(See above for address)
TERMINATED: 05/17/2012
*ATTORNEY TO BE NOTICED***Defendant****Sterling Chemicals, Inc. Medical Benefits Plan for Retirees**represented by **Kelley Riddle Edwards**
(See above for address)

*TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED*

Kerry E Notestine
(See above for address)
ATTORNEY TO BE NOTICED

Nitin Sud
(See above for address)
*TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED*

Sarah Beth Morton
(See above for address)
ATTORNEY TO BE NOTICED

Stefanie R Moll
(See above for address)
*TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED*

Defendant

**Sterling Chemicals Inc. Prescription
Drug Benefits Plan for Retirees**

represented by **Kelley Riddle Edwards**
(See above for address)
*TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED*

Kerry E Notestine
(See above for address)
ATTORNEY TO BE NOTICED

Nitin Sud
(See above for address)
*TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED*

Sarah Beth Morton
(See above for address)
ATTORNEY TO BE NOTICED

Stefanie R Moll
(See above for address)
*TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED*

Counter Claimant

**Sterling Chemicals Inc Employee
Benefits Plans Committee**
*in its Capacity as Plan Administrator of
the Sterling Chemicals Inc Medical*

represented by **Kerry E Notestine**
(See above for address)
ATTORNEY TO BE NOTICED

*Benefits Plan for Salaried Employees
and the Sterling Chemicals Inc
Prescription Drug Benefits Plan for
Salaried Employees*

Nitin Sud
(See above for address)
TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED

Counter Claimant

**Sterling Chemicals Inc Medical
Benefits Plan for Salaried Employees**

represented by **Kerry E Notestine**
(See above for address)
ATTORNEY TO BE NOTICED

Nitin Sud
(See above for address)
TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED

Counter Claimant

**Sterling Chemicals Inc Prescription
Drug Benefits Plan for Salaried
Employees**

represented by **Kerry E Notestine**
(See above for address)
ATTORNEY TO BE NOTICED

Nitin Sud
(See above for address)
TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED

Counter Claimant

**Sterling Chemicals, Inc. Medical
Benefits Plan for Retirees**

represented by **Kerry E Notestine**
(See above for address)
ATTORNEY TO BE NOTICED

Nitin Sud
(See above for address)
TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED

Sarah Beth Morton
(See above for address)
ATTORNEY TO BE NOTICED

Counter Claimant

**Sterling Chemicals Inc
Individually and as successor-in-
interest to Sterling Chemicals Holdings
Inc**

represented by **Kerry E Notestine**
(See above for address)
ATTORNEY TO BE NOTICED

Nitin Sud
(See above for address)

*TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED*

Sarah Beth Morton
(See above for address)
ATTORNEY TO BE NOTICED

Counter Claimant

**Sterling Chemicals Inc. Prescription
Drug Benefits Plan for Retirees**

represented by **Kerry E Notechine**
(See above for address)
ATTORNEY TO BE NOTICED

Nitin Sud
(See above for address)
*TERMINATED: 05/17/2012
ATTORNEY TO BE NOTICED*

Sarah Beth Morton
(See above for address)
ATTORNEY TO BE NOTICED

V.

Counter Defendant

Robert E Evans

represented by **Ronald Martin Weber , Jr**
(See above for address)
*LEAD ATTORNEY
ATTORNEY TO BE NOTICED*

Christa J Boyd Nafstad
(See above for address)
ATTORNEY TO BE NOTICED

Hal K Gillespie
(See above for address)
ATTORNEY TO BE NOTICED

Karla S Jackson
(See above for address)
*TERMINATED: 10/29/2008
ATTORNEY TO BE NOTICED*

Russell Stanley Post
(See above for address)
ATTORNEY TO BE NOTICED

Walter D Roper
(See above for address)
ATTORNEY TO BE NOTICED

Counter Defendant**Relmond H Hamilton**represented by **Ronald Martin Weber , Jr**
(See above for address)
LEAD ATTORNEY
*ATTORNEY TO BE NOTICED***Hal K Gillespie**
(See above for address)
*ATTORNEY TO BE NOTICED***Karla S Jackson**
(See above for address)
TERMINATED: 10/29/2008
*ATTORNEY TO BE NOTICED***Russell Stanley Post**
(See above for address)
*ATTORNEY TO BE NOTICED***Walter D Roper**
(See above for address)
*ATTORNEY TO BE NOTICED***Counter Defendant****Dennis Harthun**represented by **Ronald Martin Weber , Jr**
(See above for address)
LEAD ATTORNEY
*ATTORNEY TO BE NOTICED***Hal K Gillespie**
(See above for address)
*ATTORNEY TO BE NOTICED***Karla S Jackson**
(See above for address)
TERMINATED: 10/29/2008
*ATTORNEY TO BE NOTICED***Russell Stanley Post**
(See above for address)
*ATTORNEY TO BE NOTICED***Walter D Roper**
(See above for address)
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
02/16/2007	1	COMPLAINT against all defendants (Filing fee \$ 350) filed by Robert E

		Evans, Relmond H Hamilton, Dennis Harthun.(mmapps,) Additional attachment(s) added on 2/16/2007 (mmapps,). (Entered: 02/16/2007)
02/16/2007		Summons Issued as to Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Fibers Inc, Sterling Chemicals Inc, filed. (mmapps,) (Entered: 02/16/2007)
02/16/2007	2	ORDER for Initial Pretrial and Scheduling Conference by Telephone and Order to Disclose Interested Persons. Telephone Conference set for 5/7/2007 at 04:30 PM by telephone before Judge Kenneth M. Hoyt. (Signed by Judge Kenneth M. Hoyt) Parties notified.(mmapps,) (Entered: 02/16/2007)
02/16/2007		Filing fee re: 1 Complaint : \$350.00, receipt number 579211, filed. (agould,) (Entered: 02/16/2007)
02/20/2007	3	FIRST AMENDED Class Action Complaint against Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Fibers Inc, Sterling Chemicals Inc filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. Related document: 1 Complaint filed by Dennis Harthun, Robert E Evans, Relmond H Hamilton.(ejuarez,) (Entered: 02/21/2007)
02/23/2007	4	RETURN of Service, filed.(Weber, Ronald) (Entered: 02/23/2007)
03/02/2007	5	CERTIFICATE OF INTERESTED PARTIES, filed.(Weber, Ronald) (Entered: 03/02/2007)
03/02/2007	6	NOTICE of Appearance by Karla S. Jackson on behalf of all plaintiffs, filed. (Jackson, Karla) (Entered: 03/02/2007)
03/13/2007	7	ANSWER to Amended Complaint by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Inc, filed.(Notestine, Kerry) (Entered: 03/13/2007)
04/20/2007	8	CERTIFICATE OF INTERESTED PARTIES by Defendants', filed. (Notestine, Kerry) (Entered: 04/20/2007)
04/25/2007	9	JOINT DISCOVERY/CASE MANAGEMENT PLAN by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Robert E Evans, Relmond H Hamilton, Dennis Harthun, Sterling Chemicals Inc, filed.(Jackson, Karla) (Entered: 04/25/2007)
05/11/2007	10	ORDER FOLLOWING TELEPHONE SCHEDULING CONFERENCE held on May 7, 2007. Appearances: Hal Gillispie, Walt Roper, Eve McFadden, Nitin Sad. Appearances: Karla S Jackson, Kerry E Notestine, Ronald Martin Weber, Jr. ETT: 2 Weeks. Bench. Joinder of Parties due by 6/15/2007 Pltf Expert Witness List due by 1/14/2008 Pltf Expert Report due by 1/14/2008

		Deft Expert Witness List due by 2/14/2008 Deft Expert Report due by 2/14/2008 Discovery due by 7/31/2008 Dispositive Motion Filing due by 7/31/2008 Docket Call set for 9/8/2008 at 11:30 AM in Courtroom 11A before Judge Kenneth M. Hoyt.(Signed by Judge Kenneth M. Hoyt) Parties notified.(bgoolsby,) (Entered: 05/11/2007)
05/16/2007	11	NOTICE of <i>Change of Firm Affiliation</i> by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. (Weber, Ronald) (Entered: 05/16/2007)
05/31/2007	12	Unopposed MOTION to Dismiss <i>Partial Defendant Sterling Fibers, Inc. only</i> by all plaintiffs, filed. Motion Docket Date 6/20/2007. (Attachments: # 1 Proposed Order on Motion Partial Dismissal)(Weber, Ronald) (Entered: 05/31/2007)
06/05/2007	13	ORDER granting 12 Unopposed MOTION for Partial Voluntary Dismissal <i>as to Defendant Sterling Fibers, Inc. only</i> and to Amend Style, Sterling Fibers Inc terminated.(Signed by Judge Kenneth M. Hoyt) Parties notified. (djustice,) (Entered: 06/05/2007)
06/15/2007	14	Second AMENDED Complaint with Jury Demand against Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Inc filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun.(Weber, Ronald) (Entered: 06/15/2007)
06/28/2007	15	ANSWER to 14 Amended Complaint by Sterling Chemicals Inc, filed. (Notestine, Kerry) (Entered: 06/28/2007)
07/06/2007	16	MOTION to Dismiss by Sterling Chemicals Inc, filed. Motion Docket Date 7/26/2007. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Exhibit C# 4 Exhibit D# 5 Exhibit E# 6 Exhibit F# 7 Exhibit G# 8 Exhibit H)(Notestine, Kerry) (Entered: 07/06/2007)
07/26/2007	17	MOTION for Leave to File Excess Pages by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 8/15/2007. (Attachments: # 1 Proposed Order)(Weber, Ronald) (Entered: 07/26/2007)
07/26/2007	18	RESPONSE in Opposition to 16 MOTION to Dismiss, filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Attachments: # 1 Proposed Order # 2 Exhibit 1# 3 Exhibit 2# 4 Exhibit 3# 5 Errata 4# 6 Exhibit 5# 7 Exhibit 6# 8 Exhibit 7# 9 Exhibit 8# 10 Exhibit 9# 11 Exhibit 10# 12 Exhibit 11# 13 Exhibit 12# 14 Exhibit 13# 15 Exhibit 14# 16 Appendix 1 - Agway Case# 17 Appendix 2 - Doskocil Case# 18 Appendix 3 - Farmland Case# 19 Appendix 4 - Trap Rock Case# 20 Appendix 5 - North American Case) (Weber, Ronald) (Entered: 07/26/2007)
07/26/2007	19	ORDER granting 17 Motion for Leave to File Excess Pages.(Signed by Judge Kenneth M. Hoyt) Parties notified.(djustice,) (Entered: 07/26/2007)
07/27/2007	20	Letter from Karla S Jackson re: Vacation, filed. (mmapps,) (Entered: 07/27/2007)
08/21/2007	21	Letter from Kerry E. Notestine re: Reply Brief, filed. (rvazquez,) (Entered:

		08/22/2007)
08/23/2007	22	ORDER denying 16 Motion to Dismiss (construed as a motion for summary judgment). Pltfs may amend their pleadings to properly plead fraud or concealment under ERISA. (Signed by Judge Kenneth M. Hoyt) Parties notified.(djustice,) (Entered: 08/23/2007)
09/07/2007	23	Unopposed MOTION to Amend 14 Amended Complaint/Counterclaim/Crossclaim etc., by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 9/27/2007. (Attachments: # 1 Proposed Order)(Weber, Ronald) (Entered: 09/07/2007)
09/07/2007	24	MOTION for Reconsideration of 22 Order on Motion to Dismiss by Sterling Chemicals Inc, filed. Motion Docket Date 9/27/2007. (Attachments: # 1 Attachment 1# 2 Attachment 2# 3 Proposed Order)(Notestine, Kerry) (Entered: 09/07/2007)
09/11/2007	25	ORDER granting 23 Motion to Amend to Change Two Deft Parties.(Signed by Judge Kenneth M. Hoyt) Parties notified.(djustice,) (Entered: 09/11/2007)
09/17/2007	26	Third AMENDED Class Action Complaint against Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals, Inc. Prescription Drug Benefits Plan for Retirees, Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun.(Weber, Ronald) (Entered: 09/17/2007)
09/24/2007		Summons Issued as to Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals, Inc. Prescription Drug Benefits Plan for Retirees, filed.(espencer,) (Entered: 09/24/2007)
09/27/2007	27	RESPONSE to 24 MOTION for Reconsideration of 22 Order on Motion to Dismiss, filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Attachments: # 1 Affidavit Declaration of R. Martin Weber, Jr.# 2 Exhibit I# 3 Exhibit II# 4 Exhibit III# 5 Exhibit IV# 6 Exhibit V# 7 Appendix I - Kendavis# 8 Proposed Order)(Weber, Ronald) (Entered: 09/27/2007)
10/01/2007	28	ORDER denying 24 Motion for Reconsideration.(Signed by Judge Kenneth M. Hoyt) Parties notified.(kmurphy,) (Entered: 10/01/2007)
10/12/2007	29	WAIVER OF SERVICE Returned Executed as to Sterling Chemicals, Inc. Medical Benefits Plan for Retirees served on 9/28/2007, answer due 11/27/2007, filed.(Weber, Ronald) (Entered: 10/12/2007)
10/12/2007	30	WAIVER OF SERVICE Returned Executed as to Sterling Chemicals, Inc. Prescription Drug Benefits Plan for Retirees served on 9/28/2007, answer due 11/27/2007, filed.(Weber, Ronald) (Entered: 10/12/2007)
11/16/2007	31	MOTION to Compel Discovery by all plaintiffs, filed. Motion Docket Date 12/6/2007. (Attachments: # 1 Exhibit Exhibits A - I to Plaintiffs' Motion to Compel# 2 Proposed Order)(Jackson, Karla) (Entered: 11/16/2007)
11/20/2007	32	ORDER for Expedited Response, Set Deadlines as to 31 MOTION to Compel Discovery. Responses due by 11/30/2007.(Signed by Judge Kenneth M.

		Hoyt) Parties notified.(dpalacios,) (Entered: 11/20/2007)
11/21/2007	33	MOTION for Interlocutory Appeal as to 22 Order on Motion to Dismiss, 28 Order on Motion for Reconsideration, MOTION to Stay <i>Case Pending Appeal</i> by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Inc, filed. Motion Docket Date 12/11/2007. (Attachments: # 1 Proposed Order)(Notestine, Kerry) (Entered: 11/21/2007)
11/27/2007	34	NOTICE of <i>Joinder</i> re: 33 MOTION for Interlocutory Appeal as to 22 Order on Motion to Dismiss, 28 Order on Motion for Reconsideration MOTION for Interlocutory Appeal as to 22 Order on Motion to Dismiss, 28 Order on Motion for Reconsideration MOTION to Stay <i>Case Pending Appeal</i> by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees, filed. (Notestine, Kerry) (Entered: 11/27/2007)
11/27/2007	35	ANSWER to Amended Complaint by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees, filed.(Notestine, Kerry) (Entered: 11/27/2007)
11/30/2007	36	RESPONSE to 31 MOTION to Compel Discovery, filed by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees. (Attachments: # 1 Exhibit 1-2# 2 Exhibit 3-4# 3 Exhibit 5-6# 4 Exhibit 7-8# 5 Exhibit 9-10) (Notestine, Kerry) (Entered: 11/30/2007)
12/05/2007	37	ORDER denying as moot 31 Motion to Compel Discovery. (Signed by Judge Kenneth M. Hoyt) Parties notified.(kmurphy,) (Entered: 12/05/2007)
12/10/2007	38	Unopposed MOTION for Extension of Time to Respond to Defendants' Motion for Certification of Interlocutory Appeal and to Stay Case Pending Appeal by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 12/31/2007. (Attachments: # 1 Proposed Order)(Weber, Ronald) (Entered: 12/10/2007)
12/12/2007	39	ORDER granting 38 Unopposed MOTION for Extension of Time to Respond to Defendants' Motion for Certification of Interlocutory Appeal and to Stay Case Pending Appeal, Set Deadlines/Hearings as to 33 MOTION for Interlocutory Appeal and MOTION to Stay <i>Case Pending Appeal</i> . Responses due by 12/17/2007. (Signed by Judge Kenneth M. Hoyt) Parties notified. (dpalacios,) (Entered: 12/12/2007)

12/17/2007	40	RESPONSE to 33 MOTION for Interlocutory Appeal as to 22 Order on Motion to Dismiss, 28 Order on Motion for Reconsideration MOTION for Interlocutory Appeal as to 22 Order on Motion to Dismiss, 28 Order on Motion for Reconsideration MOTION to Stay <i>Case Pending Appeal</i> , filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Attachments: # 1 Exhibit 1# 2 Proposed Order Denying Defendants' Motion)(Weber, Ronald) (Entered: 12/17/2007)
12/28/2007	41	REPLY to Response to 33 MOTION for Certification of Interlocutory Appeal and to Stay Case Pending Appeal, filed by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees. (Attachments: # 1 Exhibit 1-2)(Notestine, Kerry) Linked to #33 on 1/18/2008 (ltien,). (Entered: 12/28/2007)
01/09/2008	42	ORDER denying 33 MOTION for Interlocutory Appeal as to 22 Order on Motion to Dismiss, 28 Order on Motion for Reconsideration and MOTION to Stay <i>Case Pending Appeal</i> Cross Motions due by 2/11/2008, Responses due by 3/12/2008. (Signed by Judge Kenneth M. Hoyt) Parties notified. (dpalacios,) (Entered: 01/09/2008)
01/10/2008	43	Unopposed MOTION for Extension of Time to Designate Experts and File Reports by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 1/30/2008. (Attachments: # 1 Proposed Order)(Weber, Ronald) (Entered: 01/10/2008)
01/11/2008	44	ORDER granting 43 Unopposed MOTION for Extension of Time to Designate Experts and File Reports Pltf Expert Report due by 1/21/2008,Pltf Expert Witness List due by 1/21/2008. Deft Expert Report due by 2/21/2008,Deft Expert Witness List due by 2/21/2008. (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 01/11/2008)
01/21/2008	45	DESIGNATION OF EXPERT WITNESS LIST by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. (Attachments: # 1 Exhibit Report of Reese# 2 Exhibit Report Steege# 3 Exhibit Report Burch)(Weber, Ronald) (Entered: 01/21/2008)
02/07/2008	46	Unopposed MOTION for Leave to File Excess Pages by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 2/27/2008. (Attachments: # 1 Proposed Order)(Weber, Ronald) (Entered: 02/07/2008)
02/08/2008	47	Opposed MOTION to Certify Class by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 2/28/2008. (Attachments: # 1 Exhibit A# 2 Exhibit B# 3 Exhibit C# 4 Exhibit D# 5 Exhibit E# 6 Exhibit F# 7 Exhibit G# 8 Proposed Order)(Weber, Ronald) (Entered: 02/08/2008)
02/08/2008	48	MOTION for Partial Summary Judgment by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 2/28/2008. (Attachments: # 1 Exhibit 1# 2 Exhibit 2# 3 Exhibit 3# 4 Exhibit 4# 5 Exhibit 5# 6 Exhibit 6# 7 Exhibit 7# 8 Exhibit 8# 9 Exhibit 9# 10 Exhibit 10# 11

		Exhibit 11# 12 Exhibit 12# 13 Exhibit 13# 14 Exhibit 14# 15 Exhibit 15# 16 Exhibit 16# 17 Exhibit 17# 18 Exhibit 18# 19 Exhibit 19# 20 Exhibit 20# 21 Exhibit 21# 22 Exhibit 22# 23 Exhibit 23# 24 Exhibit 24# 25 Exhibit 25# 26 Exhibit 26# 27 Exhibit 27# 28 Exhibit 28# 29 Exhibit 29# 30 Exhibit 30# 31 Exhibit 31# 32 Exhibit 32# 33 Exhibit 33# 34 Exhibit 34# 35 Exhibit 35# 36 Exhibit 36# 37 Exhibit 37# 38 Exhibit 38# 39 Exhibit 39# 40 Exhibit 40# 41 Exhibit 41# 42 Exhibit 42# 43 Exhibit 43# 44 Exhibit 44# 45 Exhibit 45# 46 Exhibit 46# 47 Exhibit 47# 48 Exhibit 48# 49 Exhibit 49# 50 Exhibit 50# 51 Exhibit 51# 52 Exhibit 52# 53 Exhibit 53# 54 Errata 54# 55 Exhibit 55# 56 Exhibit 56# 57 Exhibit 57# 58 Exhibit 58# 59 Exhibit 59# 60 Exhibit 60# 61 Exhibit 61# 62 Exhibit 62# 63 Exhibit 63# 64 Exhibit 64# 65 Exhibit 65# 66 Exhibit 66# 67 Exhibit 67# 68 Proposed Order)(Weber, Ronald) (Entered: 02/08/2008)
02/08/2008	49	DECLARATION of Robert Evans re: 48 MOTION for Partial Summary Judgment, filed.(Weber, Ronald) (Entered: 02/08/2008)
02/08/2008	50	DECLARATION of Relmond Hamilton re: 48 MOTION for Partial Summary Judgment, filed.(Weber, Ronald) (Entered: 02/08/2008)
02/08/2008	51	DECLARATION of Dennis Harthus re: 48 MOTION for Partial Summary Judgment, filed.(Weber, Ronald) (Entered: 02/08/2008)
02/08/2008	52	DECLARATION of Carol Lanthrip re: 48 MOTION for Partial Summary Judgment, filed.(Weber, Ronald) (Entered: 02/08/2008)
02/08/2008	53	DECLARATION of R. Martin Weber, Jr. re: 48 MOTION for Partial Summary Judgment, filed.(Weber, Ronald) (Entered: 02/08/2008)
02/12/2008	54	ORDER granting 46 Motion for Leave to File Excess Pages. (Signed by Judge Kenneth M. Hoyt) Parties notified.(ypippin,) (Entered: 02/12/2008)
02/19/2008	55	Unopposed MOTION for Extension of Time to Respond to the Plaintiffs' Motions for Partial Summary Judgment and to Certify Class and to Designate a Bankruptcy Expert by Sterling Chemicals Inc, filed. Motion Docket Date 3/10/2008. (Attachments: # 1 Proposed Order)(Notestine, Kerry) (Entered: 02/19/2008)
02/21/2008	56	ORDER granting 55 Unopposed MOTION for Extension of Time to Respond to the Plaintiffs' Motions for Partial Summary Judgment and to Certify Class and to extend time to designate a bankruptcy expert ; Motion-related deadline set re: 48 MOTION for Partial Summary Judgment, 47 Opposed MOTION to Certify Class Responses due by 3/10/2008. Deft' Bankruptcy Expert Witness Designation and Report due by 3/10/08. (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 02/21/2008)
02/21/2008		***Set/Reset Deadlines: Defts' Bankruptcy Expert Witness Designation and Report due by 3/10/2008. (dpalacios,) (Entered: 02/21/2008)
02/21/2008	57	DESIGNATION OF EXPERT WITNESS LIST by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical

		Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees, filed. (Attachments: # 1 Exhibit 1-3)(Notestine, Kerry) (Entered: 02/21/2008)
03/05/2008	58	Letter from Karla S. Jackson re: Vacation, filed. (lfilmore,) (Entered: 03/05/2008)
03/10/2008	59	MOTION to Strike 45 Designation of Expert Witness List <i>and Report</i> by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees, filed. Motion Docket Date 3/31/2008. (Attachments: # 1 Proposed Order)(Notestine, Kerry) (Entered: 03/10/2008)
03/10/2008	60	MOTION to Strike 48 MOTION for Partial Summary Judgment <i>Evidence</i> by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees, filed. Motion Docket Date 3/31/2008. (Attachments: # 1 Proposed Order)(Notestine, Kerry) (Entered: 03/10/2008)
03/10/2008	61	RESPONSE to 48 MOTION for Partial Summary Judgment, filed by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees. (Attachments: # 1 Exhibit 68 - 71# 2 Exhibit 72 - 75# 3 Exhibit 76 - 79# 4 Exhibit 80 - 83# 5 Exhibit 84 - 87# 6 Exhibit 88 - 91# 7 Exhibit 92 - 95# 8 Exhibit 96 - 98# 9 Proposed Order)(Notestine, Kerry) (Entered: 03/10/2008)
03/10/2008	62	DESIGNATION OF EXPERT WITNESS LIST by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees, filed. (Attachments: # 1 Exhibit 1 - 2)(Notestine, Kerry) (Entered: 03/10/2008)
03/10/2008	63	RESPONSE to 47 Opposed MOTION to Certify Class, filed by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees. (Attachments: # 1 Exhibit A# 2 Proposed Order)(Notestine, Kerry) (Entered: 03/10/2008)
03/11/2008	64	Amended DESIGNATION OF EXPERT WITNESS LIST by Sterling

		Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals, Inc. Prescription Drug Benefits Plan for Retirees, filed. (Attachments: # 1 Exhibit 1-2)(Notestine, Kerry) (Entered: 03/11/2008)
03/12/2008	65	NOTICE of Appearance by Hal K. Gillespie on behalf of Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. (Gillespie, Hal) (Entered: 03/12/2008)
03/20/2008	66	MOTION to Stay <i>Proceedings Pending Further Pursuit of Administrative Remedies</i> by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 4/9/2008. (Jackson, Karla) (Entered: 03/20/2008)
03/20/2008	67	REPLY to Response to 47 Opposed MOTION to Certify Class, filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Roper, Walter) (Entered: 03/20/2008)
03/20/2008	68	REPLY to Response to 48 MOTION for Partial Summary Judgment, filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Jackson, Karla) (Entered: 03/20/2008)
03/24/2008	69	NOTICE <i>Regarding Partially Unopposed Motion to Stay</i> re: 66 MOTION to Stay <i>Proceedings Pending Further Pursuit of Administrative Remedies</i> by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. (Attachments: # 1 Exhibit Email from Nitin Sud 3-24-08)(Jackson, Karla) (Entered: 03/24/2008)
03/24/2008	70	PROPOSED ORDER re: 66 MOTION to Stay <i>Proceedings Pending Further Pursuit of Administrative Remedies</i> , filed.(Jackson, Karla) (Entered: 03/24/2008)
03/25/2008	71	ORDER granting 66 Motion to Stay Proceedings for the parties to pursue administrative remedies. (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 03/25/2008)
03/25/2008	72	ORDER denying as moot 48 Motion for Partial Summary Judgment; denying as moot 60 Motion to Strike the motion for partial summary judgment evidence; deferring ruling on 59 Motion to Strike designation of expert witnesses. (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 03/25/2008)
03/25/2008	73	ORDER referring the 47 Opposed MOTION to Certify Class to Magistrate Judge Calvin Botley for report and recommendation. (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 03/25/2008)
04/08/2008	74	MOTION for Reconsideration of 71 Order on Motion to Stay by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals, Inc. Prescription Drug Benefits Plan for Retirees, filed. Motion

		Docket Date 4/28/2008. (Attachments: # 1 Exhibit 1-4# 2 Proposed Order) (Notestine, Kerry) (Entered: 04/08/2008)
04/10/2008	75	ORDER granting 74 Motion for Reconsideration of Order entered 3/25/08; Order amended to delete paragraphs 3-5 and 6 and to exclude the 60-day stay period from paragraph 2. The stay remains in effect until the admin. process is exhausted. (Signed by Judge Kenneth M. Hoyt) Parties notified. (dpalacios,) (Entered: 04/10/2008)
04/21/2008	76	NOTICE of Change of Address by Crowley Norman LLP, counsel for Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. (Weber, Ronald) (Entered: 04/21/2008)
08/22/2008	77	MOTION to Lift Stay by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 9/11/2008. (Attachments: # 1 Proposed Order Granting Motion to Lift Stay)(Weber, Ronald) (Entered: 08/22/2008)
08/25/2008	78	ORDER granting 77 MOTION to Lift Stay (Telephone Scheduling Conference set for 8/28/2008 at 03:00 PM before Judge Kenneth M. Hoyt). (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 08/25/2008)
08/28/2008	79	ORDER FOLLOWING TELEPHONE SCHEDULING CONFERENCE held on 8/28/08 Appearances: Kerry E Notestine, Walter D Roper, Ronald Martin Weber, Jr. ; granting 77 MOTION to Lift Stay; case is placed back on the Court's active docket. (Any additional Expert Witness Designations and reports due by 1/31/2009, Discovery due by 5/31/2009, Dispositive Motion Filing due by 6/30/2009, Docket Call set for 9/14/2009 at 11:30 AM in Courtroom 11A before Judge Kenneth M. Hoyt), Motion-related deadline set re: 48 MOTION for Partial Summary Judgment, 47 Opposed MOTION to Certify Class (Supplemental briefing due by 9/15/2008; Responses due by 9/30/2008, Replies due by 10/10/2008). The 73 Order referring the Class Certification issue to Magistrate Botley is WITHDRAWN; Motions No Longer Referred: 77 MOTION to Lift Stay.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 08/28/2008)
09/11/2008	80	SUPPLEMENT to 47 Opposed MOTION to Certify Class by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. (Attachments: # 1 Exhibit 1 - March 28, 2008 Correspondence, # 2 Exhibit 2 - Correspondence dated April 30, 2008, # 3 Exhibit 3 - Correspondence dated June 6, 2003, # 4 Exhibit 4 - Correspondence dated August 12, 2008)(Weber, Ronald) (Entered: 09/11/2008)
09/11/2008	81	SUPPLEMENT to 48 MOTION for Partial Summary Judgment by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. (Attachments: # 1 Exhibit 1 - Correspondence dated March 28, 2008, # 2 Exhibit 2 - Correspondence dated April 30, 2008, # 3 Exhibit 3 - Correspondence dated June 6, 2008, # 4 Exhibit 4 - Correspondence dated August 12, 2008)(Weber, Ronald) (Entered: 09/11/2008)
09/30/2008	82	RESPONSE to 81 Supplemental Brief in Support of 48 MOTION for Partial Summary Judgment , and Defendants' CROSS MOTION for Summary Judgment, filed by Sterling Chemicals Inc Employee Benefits Plans

		Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees. Motion Docket Date 10/20/2008. (Attachments: # 1 Exhibit A & B)(Notestine, Kerry) Cross Motion added, entry linked to #48 on 10/7/2008 (ltien,). (Entered: 09/30/2008)
09/30/2008	83	RESPONSE to 80 Supplemental Brief in Support of 47 MOTION for Class Certification, filed by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees. (Notestine, Kerry) Linked to #47 on 10/7/2008 (ltien,). (Entered: 09/30/2008)
10/01/2008	84	SUPPLEMENT to 61 Response to 48 MOTION for Partial Summary Judgment, by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees, filed.(Notestine, Kerry) Linked to #48 on 10/7/2008 (ltien,). (Entered: 10/01/2008)
10/06/2008	85	Unopposed MOTION for Extension of Time to file Reply/Response Brief by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 10/27/2008. (Attachments: # 1 Proposed Order)(Weber, Ronald) (Entered: 10/06/2008)
10/07/2008	86	ORDER granting 85 Unopposed MOTION for Extension of Time to file Reply/Response Brief ; Motion-related deadline set re: 48 MOTION for Partial Summary Judgment (Replies due by 10/20/2008).(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 10/07/2008)
10/10/2008	87	REPLY to 83 Response, to Plaintiffs' Supplemental Brief in Support of Plaintiffs' 47 Opposed Motion for Class Certification, filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Weber, Ronald) Modified on 10/20/2008 (dpalacios,). (Entered: 10/10/2008)
10/20/2008	88	MOTION for Leave to Amend Class Allegations and Amend Complaint by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 11/10/2008. (Attachments: # 1 Ex A - 4th Amended Complaint) (dpalacios,) (Entered: 10/20/2008)
10/20/2008	89	Plaintiffs' Combined 1) REPLY BRIEF in Support of 48 MOTION for Partial Summary Judgment and 2) RESPONSE to 82 CROSS MOTION for Summary Judgment filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D)(dpalacios,) (Entered: 10/20/2008)
10/29/2008	90	Unopposed MOTION for attorney substitution by Robert E Evans. Attorney

		Christa J. Boyd-Nafstad added. Attorney Karla S Jackson terminated, filed. (Attachments: # 1 Proposed Order)(Nafstad, Christa) Modified on 10/30/2008 (dpalacios,). (Entered: 10/29/2008)
10/30/2008	91	ORDER granting 90 Motion to Substitute Attorney Christa J. Boyd-Nafstad in the stead of Karla S. Jackson.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) Modified on 10/30/2008 (dpalacios,). (Entered: 10/30/2008)
10/31/2008	92	REPLY to Response to 82 CROSS MOTION for Summary Judgment, filed by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees. (Sud, Nitin) (Entered: 10/31/2008)
11/11/2008	93	NOTICE of <i>Withdrawal of Opposition</i> re: 88 MOTION to Amend by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees, filed. (Notestine, Kerry) (Entered: 11/11/2008)
11/11/2008	94	Unopposed MOTION for Leave to File Counterclaim by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees, filed. Motion Docket Date 12/1/2008. (Attachments: # 1 Exhibit A)(Notestine, Kerry) (Entered: 11/11/2008)
11/12/2008	95	PROPOSED ORDER <i>Granting Plaintiffs' Motion For Leave To Amend Class Allegations and Amend Complaint</i> re: 88 MOTION to Amend, filed.(Weber, Ronald) (Entered: 11/12/2008)
11/12/2008	96	PROPOSED ORDER re: 94 Unopposed MOTION for Leave to File Counterclaim, filed.(Notestine, Kerry) (Entered: 11/12/2008)
11/12/2008	97	ORDER granting 88 Motion for leave to amend class allegations and amend complaint; pltfs shall file their fourth amended complaint w/i 3 business days. (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 11/13/2008)
11/13/2008	98	ORDER granting 94 Motion for Leave to File Counterclaim; defts to file counterclaim w/i 10 days.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 11/13/2008)
11/14/2008	99	Fourth AMENDED COMPLAINT against all defendants filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun.(Weber, Ronald) (Entered: 11/14/2008)

11/18/2008	100	COUNTERCLAIM against Robert E Evans, Relmond H Hamilton, Dennis Harthun filed by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees.(Notestine, Kerry) (Entered: 11/18/2008)
11/19/2008	101	MEMORANDUM OPINION AND ORDER granting 47 Opposed MOTION to Certify Class. Pltf's claims brought pursuant to 29 U.S.C. 1132(a)(1) are certified at this time; the Court withholding certification of other claims until a later time; The Cochran Firm Dallas, LLP, Gillespie, Rozen, Watsky, & Jones P.C. and Crowley Norman LLP are appointed Class Counsel; and, Pltf's Robert Evans, Relmond Hamilton, and Dennis Harthun are appointed and shall serve as the representatives of the Class. (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 11/19/2008)
12/01/2008	102	Unopposed MOTION for Extension of Time to File an Answer to Plaintiffs' Fourth Amended Class Action Complaint by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees, filed. Motion Docket Date 12/22/2008. (Attachments: # 1 Proposed Order)(Notestine, Kerry) (Entered: 12/01/2008)
12/02/2008	103	ORDER granting 102 Unopposed MOTION for Extension of Time to File an Answer to Plaintiffs' Fourth Amended Class Action Complaint ; Answer due for Sterling Chemicals Inc Employee Benefits Plans Committee 12/5/2008; Sterling Chemicals, Inc. Medical Benefits Plan for Retirees 12/5/2008; Sterling Chemicals Inc 12/5/2008; Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees 12/5/2008.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 12/02/2008)
12/05/2008	104	ANSWER to 99 Amended Complaint/Counterclaim/Crossclaim etc. by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemiclas, Inc. Prescription Drug Benefits Plan for Retirees, filed.(Notestine, Kerry) (Entered: 12/05/2008)
03/03/2009	105	NOTICE of Change of Address by Walt D. Roper, counsel for Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. (Roper, Walter) (Entered: 03/03/2009)
03/30/2009	106	ORDER denying 48 Motion for Partial Summary Judgment; denying 82 Motion for Summary Judgment.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 03/30/2009)
03/30/2009	107	Letter from Hal K Gillespie re: Vacation, filed. (mmapps,) (Entered:

		03/31/2009)
05/20/2009	108	Agreed MOTION to Bifurcate Trial Issues by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals, Inc. Prescription Drug Benefits Plan for Retirees, filed. Motion Docket Date 6/9/2009. (Attachments: # 1 Proposed Order)(Sud, Nitin) (Entered: 05/20/2009)
05/22/2009	109	ORDER granting 108 Motion to Bifurcate Trial Issues. The Court will consider the parties' request for appt of a Special Master at the appropriate time.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 05/22/2009)
06/25/2009	110	Unopposed MOTION for Leave to File Excess Pages by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 7/15/2009. (Attachments: # 1 Proposed Order Proposed Order Granting Extension of Page Limitation)(Weber, Ronald) (Entered: 06/25/2009)
06/25/2009	111	Opposed MOTION to Certify Class by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 7/15/2009. (Attachments: # 1 Appendix in Support of Plaintiffs' Opposed Motion for Class Certification, # 2 Appendix Part 1: Pages App 1 - App 17, # 3 Appendix Part 2: Pages App 18 - App 33, # 4 Affidavit Part 3: Pages App 34 - App 45, # 5 Appendix Part 4: Pages App 46 - App 89, # 6 Appendix Part 5: Pages App 90 - App 139, # 7 Appendix Part 6: Pages App 140 - App 179, # 8 Appendix Part 7: Pages App 180 - App 218, # 9 Appendix Part 8: Pages App 219 - App 257, # 10 Appendix Part 9: Pages App 258 - App 301, # 11 Appendix Part 10: Pages App 302 - App 332, # 12 Appendix Part 11: Pages App 333 - App 389, # 13 Proposed Order Granting Plaintiffs' Opposed Motion for Class Certification)(Weber, Ronald) (Entered: 06/25/2009)
06/26/2009	112	ORDER granting 110 Motion for Leave to File Excess Pages.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 06/26/2009)
06/29/2009	113	MOTION for Partial Summary Judgment by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals, Inc. Prescription Drug Benefits Plan for Retirees, filed. Motion Docket Date 7/20/2009. (Attachments: # 1 Exhibit A - C, # 2 Exhibit D - G, # 3 Exhibit H - I, # 4 Proposed Order)(Sud, Nitin) (Entered: 06/29/2009)
06/29/2009	114	MOTION to Reurge Motion to Strike Plaintiffs' Expert Witness and Report and Exclude Bankruptcy Expert Testimony at Trial by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals, Inc. Prescription Drug Benefits Plan for Retirees, filed. Motion Docket Date 7/20/2009. (Attachments: # 1 Proposed Order)(Sud, Nitin) (Entered: 06/29/2009)
06/30/2009	115	ORDER for expedited response ; Motion-related deadline set re: 59 MOTION

		to Strike 45 Designation of Expert Witness List <i>and Report</i> Responses due by 7/8/2009.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 06/30/2009)
07/08/2009	116	RESPONSE to 59 MOTION to Strike 45 Designation of Expert Witness List <i>and Report</i> MOTION to Strike 45 Designation of Expert Witness List <i>and Report</i> MOTION to Strike 45 Designation of Expert Witness List <i>and Report</i> , 114 MOTION to Reurge Motion to Strike Plaintiffs' Expert Witness and Report and Exclude Bankruptcy Expert Testimony at Trial, filed by Robert E Evans. (Attachments: # 1 Proposed Order)(Nafstad, Christa) (Entered: 07/08/2009)
07/09/2009	117	ORDER denying 59 Motion to Strike; denying 114 Motion to Reurge.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 07/09/2009)
07/15/2009	118	RESPONSE in Opposition to 111 Opposed MOTION to Certify Class, filed by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Fibers Inc, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals, Inc. Prescription Drug Benefits Plan for Retirees. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C)(Edwards, Kelley) (Entered: 07/15/2009)
07/20/2009	119	RESPONSE to 113 MOTION for Partial Summary Judgment, filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Attachments: # 1 Appendix, # 2 Appendix Affidavit of Walt Roper, # 3 Appendix Exhibit A, # 4 Appendix Exhibit B, # 5 Appendix Exhibit C, # 6 Appendix Exhibit D, # 7 Appendix Exhibit E, # 8 Appendix Exhibit F, # 9 Appendix App 172-226 - Unpublished Opinions)(Weber, Ronald) (Entered: 07/20/2009)
07/24/2009	120	REPLY to 119 Response to Motion,, filed by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees. (Attachments: # 1 Exhibit 1) (Sud, Nitin) (Entered: 07/24/2009)
07/27/2009	121	REPLY to 118 Response in Opposition to Motion,,, filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Attachments: # 1 Appendix 1, # 2 Appendix 2, # 3 Appendix 3, # 4 Appendix 4)(Weber, Ronald) (Entered: 07/27/2009)
08/19/2009	122	Letter from Mr. Gillespie re: Vacation letter, filed. (hler,) (Entered: 08/20/2009)
08/21/2009	123	ORDER denying without prejudice 113 Motion for Partial Summary Judgment.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 08/21/2009)
08/21/2009	124	ORDER denying 111 Motion for Class Certification of Breach of Fiduciary

		Duty Claims.(Signed by Judge Kenneth M. Hoyt) Parties notified. (dpalacios,) (Entered: 08/21/2009)
09/01/2009	125	Unopposed MOTION for Leave to File Excess Pages by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, filed. Motion Docket Date 9/24/2009. (Attachments: # 1 Proposed Order)(Sud, Nitin) (Entered: 09/01/2009)
09/03/2009	126	Unopposed MOTION for Leave to File Excess Pages by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 9/28/2009. (Attachments: # 1 Proposed Order)(Weber, Ronald) (Entered: 09/03/2009)
09/03/2009	127	Expert Report of Michael H. Reed and Marcy E. Kurtz by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, filed. (Attachments: # 1 Exhibit 1 - 3)(Sud, Nitin) (Entered: 09/03/2009)
09/04/2009	128	Joint Proposed Pretrial Order by Sterling Chemicals Inc Employee Benefits Plans Committee, Robert E Evans, Relmond H Hamilton, Dennis Harthun, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, filed. (Attachments: # 1 Ex A Plaintiffs' Exhibit List, # 2 Ex B Defendants' Exhibit List, # 3 Ex C Plaintiffs' Witness List, # 4 Ex D Defendants' Witness List, # 5 Ex E Plaintiffs' Memorandum of Law, # 6 Ex F Defendants' Memorandum of Law, # 7 Ex G Plaintiffs' Proposed FF CL, # 8 Ex H Defendants' Proposed FF CL, # 9 Ex I Plaintiffs' Designation fo Depo Testimony, # 10 Ex J Defendants' Designatton of Depo Testimony)(Weber, Ronald) (Entered: 09/04/2009)
09/08/2009	131	Proof of Service Executed as to Paul G Vanderhoeven on 9/4/2009 re: Subpoena, filed.(blacy,) (Entered: 09/09/2009)
09/08/2009	132	Proof of Service Executed as to Richard Crump on 9/4/2009 re: Subpoena, filed.(blacy,) (Entered: 09/09/2009)
09/09/2009	129	ORDER granting 126 Motion for Leave to File Excess Pages.(Signed by Judge Kenneth M. Hoyt) Parties notified.(sjones,) (Entered: 09/09/2009)
09/09/2009	130	ORDER granting 125 Motion for Leave to File Excess Pages.(Signed by Judge Kenneth M. Hoyt) Parties notified.(sjones,) (Entered: 09/09/2009)
09/10/2009		***Set/Reset Deadlines/Hearings:, ***Deadlines terminated. Jury Trial set for 9/16/2009 at 09:00 AM in Courtroom 11A before Judge Kenneth M. Hoyt (sjones,) (Entered: 09/10/2009)
09/10/2009	133	Unopposed MOTION for Continuance of Trial Setting by Robert E Evans,

		Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 10/5/2009. (Weber, Ronald) (Entered: 09/10/2009)
09/10/2009	134	AFFIDAVIT of R. Martin Weber, Jr. re: 133 Unopposed MOTION for Continuance of Trial Setting, filed.(Weber, Ronald) (Entered: 09/10/2009)
09/10/2009	135	PROPOSED ORDER re: 133 Unopposed MOTION for Continuance of Trial Setting, filed.(Weber, Ronald) (Entered: 09/10/2009)
09/10/2009	136	ORDER denying 133 Motion for Continuance.(Signed by Judge Kenneth M. Hoyt) Parties notified.(sjones,) (Entered: 09/10/2009)
09/11/2009	137	OBJECTIONS to <i>Plaintiffs' Trial Exhibits, Designations of Deposition Testimony, and Bankruptcy Expert Witness</i> , filed by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees. (Attachments: # 1 Proposed Order)(Sud, Nitin) (Entered: 09/11/2009)
09/11/2009	138	OBJECTIONS to 128 Proposed Pretrial Order,,, <i>Plaintiffs' Objections to Defendants' Exhibits</i> , filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Weber, Ronald) (Entered: 09/11/2009)
09/11/2009	139	Corrected EXHIBITS re: 128 Proposed Pretrial Order,,, by Robert E Evans, Relmond H Hamilton, Dennis Harthun Related document: 128 Proposed Pretrial Order,,, filed.(Roper, Walter) (Entered: 09/11/2009)
09/18/2009	140	Amended Witness List by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, filed.(Sud, Nitin) (Entered: 09/18/2009)
09/30/2009		***Set/Reset Hearings: Bench Trial reset for 11/10/2009 at 09:00 AM in Courtroom 11A before Judge Kenneth M. Hoyt (dpalacios,) (Entered: 09/30/2009)
11/06/2009	141	Amended Exhibit List by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed.(Weber, Ronald) (Entered: 11/06/2009)
11/06/2009	142	RESPONSE to 138 Objections to <i>Plaintiffs' Trial Exhibits</i> , filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Weber, Ronald) (Entered: 11/06/2009)
11/09/2009	143	RETURN of Service, filed.(Nafstad, Christa) (Entered: 11/09/2009)
11/10/2009	145	Minute Entry for proceedings held before Judge Kenneth M. Hoyt. First day of BENCH TRIAL held on 11/10/2009. Exhibits admitted as stated on the record. Opening statements. Pltf's evidence begins. Witness: 1) Robert Evans. Recessed until 11/12/09 at 8:30 a.m. Appearances: Hal K Gillespie, Ronald Martin Weber, Walter D Roper, Kerry E Notestine, Nitin Sud.(Court Reporter: S. Carlisle-Neisser), filed.(dpalacios,) (Entered: 11/16/2009)

11/12/2009	146	Minute Entry for proceedings held before Judge Kenneth M. Hoyt. Second day of BENCH TRIAL held on 11/12/2009. Pltf counsel, Gillespie, offered certain documents for which he requested that the Court take judicial notice of. Pltfs also tendered Ex. Nox. 158-160 for admission. Defts noted their objections on the record. Testimony of Pltfs' Expert Katherine Steege and Defts Expert Michael H. Reed. Recessed until 11/13/09 at 10:00 a.m. Appearances: Hal K Gillespie, Ronald Martin Weber, Walter D Roper, Kerry E Notestine, Nitin Sud, Susan Hoffman.(Court Reporter: S. Carlisle-Neisser), filed.(dpalacios,) (Entered: 11/16/2009)
11/13/2009	144	MOTION for Judgment by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, filed. Motion Docket Date 12/3/2009. (Attachments: # 1 Proposed Order)(Notestine, Kerry) (Entered: 11/13/2009)
11/13/2009	147	Minute Entry for proceedings held before Judge Kenneth M. Hoyt. Third day of BENCH TRIAL held on 11/13/2009. Witnesses: 1) Kenneth M. Hale; 2) Paul G. Vanderhoven; 3) Richard Krump; 4) Marsha Francis Meador. The parties stipulated to the admission of certain testimony by depo. transcripts. Pltfs Ex. 159 is admitted as a demonstrative aid. Pltfs rest. Defts move for judgment a matter of law - Court takes under advisement. Defts rest. Parties request opportunity to submit additional briefing - Briefs due w/i 30 days after transcript has been provided; any reply briefs due w/i 10 days thereafter. Evidence closed subject to reopening for errors and omissions. Appearances: Hal K Gillespie, Ronald Martin Weber, Walter D Roper, Kerry E Notestine, Nitin Sud, Susan Hoffman.(Court Reporter: B. Slavin), filed. (dpalacios,) Modified on 11/19/2009 (dpalacios,). (Entered: 11/16/2009)
11/13/2009	148	Amended Exhibit List by plaintiffs, filed.(dpalacios,) (Entered: 11/16/2009)
11/13/2009	149	Exhibit List by defendants, filed.(dpalacios,) (Entered: 11/16/2009)
12/02/2009	150	AO 435 TRANSCRIPT ORDER FORM by Nitin Sud. This is to order a transcript of Testimony and Other held on 11/13/09 before Judge Kenneth M. Hoyt (Original). Court Reporter/Transcriber: B. Slavin, filed. (kettac,) (Entered: 12/02/2009)
12/03/2009	151	RESPONSE to 144 MOTION for Judgment, filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Weber, Ronald) (Entered: 12/03/2009)
01/20/2010	152	TRANSCRIPT re: Bench Trial held on November 10, 2009 before Judge Kenneth M. Hoyt. Court Reporter/Transcriber S. Carlisle. Release of Transcript Restriction set for 4/20/2010., filed. (scarlisle) (Entered: 01/20/2010)
01/20/2010	153	TRANSCRIPT re: Bench Trial held on November 12, 2009 before Judge Kenneth M. Hoyt. Court Reporter/Transcriber S. Carlisle. Release of Transcript Restriction set for 4/20/2010., filed. (scarlisle) (Entered: 01/20/2010)

01/21/2010	154	Notice of Filing of Official Transcript as to 153 Transcript, 152 Transcript. Party notified, filed. (dclark,) (Entered: 01/21/2010)
01/21/2010	155	NOTICE of Appearance by Russell S. Post on behalf of Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. (Post, Russell) (Entered: 01/21/2010)
01/22/2010	156	TRANSCRIPT re: Bench Trial held on 11-13-09 before Judge Kenneth M. Hoyt. Court Reporter/Transcriber B. Slavin. Release of Transcript Restriction set for 4/22/2010., filed. (bslavin,) (Entered: 01/22/2010)
01/25/2010	157	Notice of Filing of Official Transcript as to 156 Transcript. Party notified, filed. (dclark,) (Entered: 01/25/2010)
02/10/2010	158	Letter from Hal K. Gillespie re: travel, filed. (mewilliams,) (Entered: 02/11/2010)
02/17/2010	159	Unopposed MOTION for Extension of Time of Three Days to File Post-Trial Brief by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 3/10/2010. (Attachments: # 1 Proposed Order)(Post, Russell) (Entered: 02/17/2010)
02/19/2010	160	ORDER granting 159 Motion for Extension of Three days to file post-trial brief until 2/24/10.(Signed by Judge Kenneth M. Hoyt) Parties notified. (dpalacios,) (Entered: 02/19/2010)
02/24/2010	161	POST-TRIAL BRIEF by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, filed. (Attachments: # 1 Exhibit 1 and 2)(Notestine, Kerry) (Entered: 02/24/2010)
02/24/2010	162	POST-TRIAL BRIEF by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. (Attachments: # 1 Appendix to Plaintiffs' Post Trial Brief, # 2 Tab 1, # 3 Tab 2, # 4 Tab 3, # 5 Tab 4)(Post, Russell) (Entered: 02/24/2010)
03/08/2010	163	RESPONSE to 162 Post-Trial Brief, filed by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees. (Attachments: # 1 Exhibit 1)(Notestine, Kerry) (Entered: 03/08/2010)
03/08/2010	164	REPLY to 161 Post-Trial Brief,, filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Post, Russell) (Entered: 03/08/2010)
04/12/2010	165	<i>Letter regarding recent Supreme Court case</i> by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, Sterling

		Chemicals, Inc. Medical Benefits Plan for Retirees, filed. (Attachments: # 1 Exhibit A)(Notestine, Kerry) (Entered: 04/12/2010)
04/15/2010	166	RESPONSE to 165 Document, <i>Letter Brief filed by Sterling Chemicals, Inc.</i> , filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Post, Russell) (Entered: 04/15/2010)
07/01/2010	167	MEMORANDUM OPINION AND ORDER. The Court holds that the defendants are entitled to judgment dismissing with prejudice the plaintiffs claims tried to this Court during the bench trial, including the class claim for denial of benefits under ERISA § 502(a)(1)(B). (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 07/01/2010)
07/01/2010	168	FINAL JUDGMENT; pltfs take nothing by this suit.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 07/01/2010)
07/15/2010	169	BILL OF COSTS in total amount \$22,744.00 by Sterling Chemicals Inc Employee Benefits Plans Committee, filed. (Attachments: # 1 Defendant's Memorandum of Authorities in Support of Its Bill of Costs, # 2 Exhibit A, # 3 Attachment 1 to Exhibit A, # 4 Attachment 2 to Exhibit A, # 5 Attachment 3 to Exhibit A, # 6 Attachment 4 to Exhibit A, # 7 Attachment 5 to Exhibit A) (Edwards, Kelley) (Entered: 07/15/2010)
07/16/2010		Costs Taxed in the amount of \$ 22744.00 re: 169 Bill of Costs,, filed. (mmapps,) (Entered: 07/16/2010)
07/16/2010	170	NOTICE OF APPEAL to US Court of Appeals for the Fifth Circuit re: 168 Final Judgment by Robert E Evans, Relmond H Hamilton, Dennis Harthun (Filing fee \$ 455, receipt number 0541-6655772), filed.(Post, Russell) (Entered: 07/16/2010)
07/16/2010	171	Amended NOTICE OF APPEAL to US Court of Appeals for the Fifth Circuit re: 167 Memorandum and Opinion, 168 Final Judgment by Robert E Evans, Relmond H Hamilton, Dennis Harthun (Filing fee \$ 455 receipt number 0541-6657726), filed.(Post, Russell) (Entered: 07/16/2010)
07/20/2010	172	Notice of the Filing of an Appeal. DKT13 transcript order form was not mailed to appellant (0 copies). Fee status: Paid. The following Notice of Appeal and related motions are pending in the District Court: 170 Notice of Appeal, 171 Notice of Appeal - Amended,, filed. (Attachments: # 1 NOA, # 2 Final Judgment, # 3 Memorandum Opinion and Order, # 4 Docket Sheet) (pyebernetsky,) (Entered: 07/20/2010)
07/26/2010	173	Notice of Assignment of USCA No. 10-20493 re: 170 Notice of Appeal, filed.(arrivera) (Entered: 07/26/2010)
07/26/2010	174	Notice of Assignment of USCA No. 10-20493 re: 171 Notice of Appeal - Amended,, filed.(arrivera) (Entered: 07/26/2010)
08/19/2010		This Electronic record on appeal has been certified per Fifth Circuit Court of Appeals re: 171 Notice of Appeal - Amended, 170 Notice of Appeal USCA No. 10-20493, filed.(blacy,) (Entered: 08/19/2010)
08/27/2010	175	DOCKETED IN ERROR TO BE REFILED. REQUEST for Electronic Copy

		of Certified Record on Appeal re: 171 Notice of Appeal - Amended, 170 Notice of Appeal by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed.(Post, Russell) Modified on 8/27/2010 (bthomas,). (Entered: 08/27/2010)
08/27/2010	176	REQUEST for Electronic Copy of Certified Record on Appeal re: 171 Notice of Appeal - Amended, 170 Notice of Appeal by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed.(Post, Russell) (Entered: 08/27/2010)
11/10/2010	177	Receipt for Withdrawal of Plaintiff's Trial Exhibits. Received by Ben Mejia., filed.(jdav,) (Entered: 11/10/2010)
11/10/2010	178	Receipt for Withdrawal of Exhibits by attorney for defts, filed.(dpalacios,) (Entered: 11/11/2010)
12/08/2010	179	REQUEST for Electronic Copy of Certified Record on Appeal re: 171 Notice of Appeal - Amended, by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, filed.(Moll, Stefanie) (Entered: 12/08/2010)
12/15/2010	180	CD Request: Response re Certified Record on Appeal re: 179 Request for Record, filed by Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, filed. (smurdock,) (Entered: 12/15/2010)
01/31/2011	181	Letter from Hal Gillespie re: vacation time, filed. (jhancock) (Entered: 02/02/2011)
03/21/2011	182	Transmittal Letter on Appeal Certified re: 171 Notice of Appeal - Amended, 170 Notice of Appeal. A paper copy of the electronic record is being transmitted to the Fifth Circuit Court of Appeals in 24 volumes. (USCA No. 10-20493), filed.(blacy,) (Entered: 03/21/2011)
04/01/2011	183	NOTICE of Receipt of Record on Appeal from US Court of Appeals for the Fifth Circuit re: 171 Notice of Appeal - Amended, (USCA No. 10-20493). Record received by USCA on 3/24/2011, filed.(hler,) (Entered: 04/05/2011)
11/25/2011	186	Order of USCA re: 171 Amended Notice of Appeal, 170 Notice of Appeal ; USCA No. 10-20493. The judgment of the District Court is reversed, and the cause is remanded to the District Court for further proceedings. (Additional attachment(s): # 1 Opinion, # 2 Return of Record) (ltien,). Modified on 7/9/2012 (ltien,). (Entered: 11/30/2011)
11/28/2011	184	<i>Letter to Honorable Kenneth M. Hoyt</i> by Sterling Chemicals Inc, filed. (Notestine, Kerry) (Entered: 11/28/2011)
11/29/2011	185	<i>Letter to Honorable Kenneth M. Hoyt</i> by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed.(Weber, Ronald) (Entered: 11/29/2011)

12/08/2011	187	NOTICE of Setting. Parties notified. Status Conference set for 12/13/2011 at 08:30 AM in by telephone before Judge Kenneth M. Hoyt, filed. Counsel for pltfs shall initiate the conference call and shall have all other participating counsel on the line when calling in. Counsels shall not call in to the conference line individually. The call shall be placed to (713) 250-5613. (dpalacios,) (Entered: 12/08/2011)
12/09/2011	188	MOTION for Protective Order by Sterling Chemicals Inc, filed. Motion Docket Date 12/30/2011. (Attachments: # 1 Exhibit A, # 2 Proposed Order) (Notestine, Kerry) (Entered: 12/09/2011)
12/12/2011	189	RESPONSE to 188 MOTION for Protective Order filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Attachments: # 1 Exhibit A)(Roper, Walter) (Entered: 12/12/2011)
12/14/2011	190	PROPOSED ORDER re: 189 Response to Motion, filed.(Roper, Walter) (Entered: 12/14/2011)
12/14/2011	191	ORDER FOLLOWING TELEPHONE SCHEDULING CONFERENCE held on 12/13/11 Appearances: Hal K Gillespie, Ronald Martin Weber, Jr, Russell Stanley Post, Walter D Roper, Kerry E Notestine. ETT: TBD. Discovery due by 4/30/2012. Dispositive Motion Filing due by 5/15/2012. Docket Call set for 7/2/2012 at 11:30 AM in Courtroom 11A before Judge Kenneth M. Hoyt. On remand, the Court takes up the issue of the pltfs' damages and the deft's counterclaim. (Signed by Judge Kenneth M. Hoyt) Parties notified. (dpalacios,) (Entered: 12/14/2011)
12/16/2011	192	<i>Letter to Honorable Kenneth M. Hoyt</i> by Sterling Chemicals Inc, filed. (Notestine, Kerry) (Entered: 12/16/2011)
12/16/2011	193	<i>Defendants' Reply to Plaintiffs' Response to Motion for Protective Order</i> by Sterling Chemicals Inc, filed.(Notestine, Kerry) (Entered: 12/16/2011)
03/26/2012	194	The petition for a writ of certiorari filed with the Supreme Court has been denied (USCA No. 10-20493) (USSC No. 11-1001), filed.(mmapps,) (Entered: 03/26/2012)
04/02/2012	195	NOTICE of Change of Address by Walt Roper, counsel for Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. (Roper, Walter) (Entered: 04/02/2012)
04/03/2012	196	MOTION for Appointment of Special Master by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 4/24/2012. (Attachments: # 1 Proposed Order)(Roper, Walter) (Entered: 04/03/2012)
04/04/2012	197	ORDER for Expedited Response; Motion-related deadline set re: 196 MOTION for Appointment of Special Master Responses due by 4/13/2012. (Signed by Judge Kenneth M. Hoyt) Parties notified.(chorace) (Entered: 04/04/2012)
04/13/2012	198	MOTION for Preliminary Injunction by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 5/4/2012. (Attachments: # 1 Affidavit /Declaration of Robert E. Evans, # 2 Affidavit /Declaration of R. Martin Weber, # 3 Proposed Order)(Weber,

		Ronald) (Entered: 04/13/2012)
04/13/2012	199	RESPONSE to 196 MOTION for Appointment of Special Master filed by Sterling Chemicals Inc. (Attachments: # 1 Proposed Order)(Notestine, Kerry) (Entered: 04/13/2012)
04/13/2012	200	MOTION for Summary Judgment, MOTION for Partial Summary Judgment (Motion Docket Date 5/4/2012.) by Sterling Chemicals Inc, filed. (Attachments: # 1 Proposed Order, # 2 Exhibit A, # 3 Exhibit B, # 4 Exhibit C, # 5 Exhibit D, # 6 Exhibit E, # 7 Exhibit F, # 8 Exhibit G, # 9 Exhibit H) (Notestine, Kerry) (Entered: 04/13/2012)
04/13/2012	201	ORDER for Expedited Response; Motion-related deadline set re: 198 MOTION for Preliminary Injunction: Responses due by 4/23/2012.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 04/13/2012)
04/20/2012	202	ORDER granting 196 Motion to Appoint Special Master for determination of damages.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 04/20/2012)
04/23/2012	203	MOTION for Partial Summary Judgment <i>on Damages and RESPONSE TO Plaintiffs' Motion for Preliminary Injunction</i> by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, filed. Motion Docket Date 5/14/2012. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit H, # 9 Exhibit I, # 10 Exhibit J, # 11 Exhibit K, # 12 Exhibit L, # 13 Exhibit M, # 14 Exhibit N, # 15 Exhibit O, # 16 Proposed Order)(Notestine, Kerry) (Entered: 04/23/2012)
04/27/2012	204	Opposed MOTION for Extension of Time to respond to Defendants' Motion for Partial Summary Judgment 200 by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 5/18/2012. (Attachments: # 1 Proposed Order)(Post, Russell) (Entered: 04/27/2012)
04/27/2012	205	REPLY in Support of 198 MOTION for Preliminary Injunction, filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Attachments: # 1 Exhibit A)(Post, Russell) (Entered: 04/27/2012)
04/30/2012	206	Unopposed MOTION for Extension of Time Supplemental Expert Report by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 5/21/2012. (Attachments: # 1 Proposed Order)(Weber, Ronald) (Entered: 04/30/2012)
04/30/2012	207	RESPONSE to 204 Opposed MOTION for Extension of Time to respond to Defendants' Motion for Partial Summary Judgment 200 Opposed MOTION for Extension of Time to respond to Defendants' Motion for Partial Summary Judgment 200 filed by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc, Sterling Chemicals Inc. Prescription

		Drug Benefits Plan for Retirees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees. (Attachments: # 1 Proposed Order)(Notestine, Kerry) (Entered: 04/30/2012)
04/30/2012	208	ORDER granting 206 Motion for Extension of Time to file supplemental expert report of Adam Reese; granted until 5/7/12.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 04/30/2012)
05/02/2012	209	ORDER granting 204 Motion for Extension of Time; Pltf's response to defts' 200 motion for partial summary judgment is extended to 20 days after the special master completes the tasks assigned in the Order of 4/20/12. (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 05/02/2012)
05/02/2012		***Deadlines terminated. (dpalacios,) (Entered: 05/02/2012)
05/03/2012	210	PROPOSED ORDER re: 196 MOTION for Appointment of Special Master, filed. (Attachments: # 1 Declaration of David Axene)(Roper, Walter) (Entered: 05/03/2012)
05/04/2012	211	LETTER OF AGREEMENT by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, filed.(Notestine, Kerry) (Entered: 05/04/2012)
05/04/2012	212	REPLY in Support of 203 MOTION for Partial Summary Judgment on <i>Damages and RESPONSE TO Plaintiffs' Motion for Preliminary Injunction</i> , filed by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees. (Attachments: # 1 Exhibit A, # 2 Exhibit B)(Notestine, Kerry) (Entered: 05/04/2012)
05/04/2012	213	ORDER granting 198 Motion for Preliminary Injunction. No bond or other security is required of the pltfs to support the issuance of this injunction. (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 05/04/2012)
05/08/2012	214	Unopposed MOTION to Substitute Attorney Sarah Morton in place of Nitin Sud by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc, Sterling Chemicals Inc Medical Benefits Plan for Salaried Employees, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, filed. Motion Docket Date 5/29/2012. (Attachments: # 1 Proposed Order)(Notestine, Kerry) (Entered: 05/08/2012)
05/08/2012	215	NOTICE OF COMPLIANCE WITH PRELIMINARY INJUNCTION re: 213 Order on Motion for Preliminary Injunction by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, filed. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Proposed Order)(Notestine, Kerry) (Entered: 05/08/2012)

05/09/2012	216	ORDER appointing David Axene as Special Master, who shall notify the Court and the parties of his acceptance of his appointment by filing, w/i 7 days, a notice of acceptance of appointment as Master.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 05/09/2012)
05/11/2012	217	MOTION for Clarification as to 208 Order on Motion for Extension of Time by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 6/1/2012. (Attachments: # 1 Exhibit Expert Report, # 2 Proposed Order)(Weber, Ronald) (Entered: 05/11/2012)
05/14/2012	218	RESPONSE in Opposition to 203 MOTION for Partial Summary Judgment <i>on Damages and RESPONSE TO Plaintiffs' Motion for Preliminary Injunction</i> , filed by Robert E Evans, Relmond H Hamilton, Dennis Harthun. (Attachments: # 1 Exhibit A)(Post, Russell) (Entered: 05/14/2012)
05/14/2012	219	ORDER for Expedited Response; Motion-related deadline set re: 217 MOTION for Clarification as to 208 Order on Motion for Extension of Time: Responses due by 5/22/2012.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 05/14/2012)
05/15/2012	220	Letter from David V. Axene re: acceptance as Special Master pursuant to Court's 216 Order appointing him, filed. (dpalacios,) (Entered: 05/15/2012)
05/17/2012	221	<i>Withdrawal of Objection to Plaintiffs' Motion for Leave to File Supplemental Expert Report</i> by Sterling Chemicals Inc Employee Benefits Plans Committee, Sterling Chemicals Inc, Sterling Chemicals Inc. Prescription Drug Benefits Plan for Retirees, Sterling Chemicals, Inc. Medical Benefits Plan for Retirees, filed.(Notestine, Kerry) (Entered: 05/17/2012)
05/17/2012	222	ORDER granting 214 Motion to Substitute Attorney Sarah Morton; Attorney Nitin Sud; Kelley Riddle Edwards and Stefanie R Moll terminated.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 05/17/2012)
05/22/2012	223	ORDER re: 217 Motion for Clarification of Court's prior order regarding expert report supplementation. The Court orders that Pltf's May 7, 2012 production to defts of the supplemental report of Adam Reese satisfied the requirements of the Court's April 30, 2012 order. (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 05/23/2012)
07/02/2012	224	ORDER OF DISMISSAL on Settlement Announcement; case dismissed without prejudice to the right of parties to move for reinstatement within ninety days. (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 07/02/2012)
07/11/2012	225	Joint MOTION to Reinstate Case and Set Date for Preliminary and Final Fairness Hearing to Obtain Court Approval of Class Action Settlement by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 8/1/2012. (Attachments: # 1 Proposed Order)(Weber, Ronald) (Entered: 07/11/2012)
07/16/2012	226	ORDER granting 225 Joint MOTION to Reinstate Case and Set Date for Preliminary and Final Fairness Hearing to Obtain Court Approval of Class Action Settlement (Preliminary Approval Hearing set for 8/9/2012 at 09:00

		AM. If granted, a Final Fairness Hearing will be set for 10/10/2012 at 09:00 AM in Courtroom 11A before Judge Kenneth M. Hoyt). Case reopened on 7/16/12. (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 07/16/2012)
07/23/2012	227	Joint MOTION to Amend 101 Memorandum and Opinion,, by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 8/13/2012. (Attachments: # 1 Exhibit 1, # 2 Proposed Order)(Weber, Ronald) (Entered: 07/23/2012)
07/23/2012	228	Unopposed MOTION for Approval of Preliminary Approval of Settlement by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. Motion Docket Date 8/13/2012. (Attachments: # 1 Appendix, # 2 Exhibit Part A, # 3 Exhibit Part B, # 4 Exhibit Part C, # 5 Exhibit Part D, # 6 Exhibit Part E, # 7 Proposed Order)(Weber, Ronald) (Entered: 07/23/2012)
07/27/2012	229	ORDER granting 227 Motion to Amend the Class Certification Order [ECF No. 101] to modify the class definition for settlement purposes.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 07/27/2012)
07/27/2012	230	PRELIMINARY APPROVAL ORDER granting 228 Motion for Preliminary Approval of Class Action Settlement.(Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 07/27/2012)
08/09/2012	231	Minute Entry for proceedings held before Judge Kenneth M. Hoyt. Preliminary Approval/Fairness Hearing held on 8/9/2012. Order to issue. Appearances: Ronald Martin Weber, Jr, Russell Stanley Post, Kerry E Notestine, Sarah Beth Morton.(Court Reporter: S. Carlisle), filed.(dpalacios,) (Entered: 08/09/2012)
08/09/2012	232	ORDER approving modifications and changes proposed at hearing held this date and directing that counsel for pltfs and class file the corrected documents at this time. (Signed by Judge Kenneth M. Hoyt) Parties notified.(dpalacios,) (Entered: 08/09/2012)
08/10/2012	233	SUPPLEMENT to 232 Order by Robert E Evans, Relmond H Hamilton, Dennis Harthun, filed. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2)(Weber, Ronald) (Entered: 08/10/2012)

PACER Service Center			
Transaction Receipt			
08/23/2012 08:24:05			
PACER Login:	cd0868	Client Code:	
Description:	Docket Report	Search Criteria:	4:07-cv-00625
Billable Pages:	30	Cost:	3.00

EXHIBIT 3

General Docket
United States Court of Appeals for the 5th Circuit

Court of Appeals Docket #: 10-20493	Docketed: 07/21/2010
Nature of Suit: 3791 Employee Retirement (E.R.I.S.A.)	Termed: 10/13/2011
Robert Evans, et al v. Sterling Chemicals, Inc., et al	
Appeal From: Southern District of Texas, Houston	
Fee Status: fee paid	
Case Type Information:	
1) Private Civil Federal 2) Private 3)	
Originating Court Information:	
District: 0541-4 : 4:07-CV-625	
Originating Judge: Kenneth M. Hoyt, U.S. District Judge	
Date Filed: 02/16/2007	
Date NOA Filed: 07/16/2010	Date Rec'd COA: 07/16/2010
Prior Cases:	
None	
Current Cases:	
None	
Panel Assignment:	
Panel: EGJ HRD ECP	
Date of Hearing: 08/31/2011	Date of Decision: 10/13/2011 Date Completed: 10/13/2011

ROBERT E. EVANS Plaintiff - Appellant	Russell Stanley Post Direct: 713-951-3700 Email: rpost@brsfir.com Fax: 713-951-3720 [COR LD NTC Retained] Beck, Redden & Secrest, L.L.P. Suite 4500 1221 McKinney Street 1 Houston Center Houston, TX 77010-2010
	Chad Flores, Esq. Direct: 713-951-3700 Email: cflores@brsfir.com Fax: 713-951-3720 [COR NTC Retained] Beck, Redden & Secrest, L.L.P. Suite 4500 1221 McKinney Street 1 Houston Center Houston, TX 77010-2010
	Ronald Martin Weber, Jr., Esq. Direct: 713-651-1771 Email: mweber@crowleynorman.com Fax: 713-651-1775 [NTC Retained] Crowley Norman, L.L.P. Suite 1775 3 Riverway Houston, TX 77056-3034
RELMOND HAMILTON Plaintiff - Appellant	Russell Stanley Post Direct: 713-951-3700 [COR LD NTC Retained] (see above)

DENNIS HARTHUN
Plaintiff - Appellant

(see above)

Ronald Martin Weber, Jr., Esq.
Direct: 713-651-1771
[NTC Retained]
(see above)

v.

STERLING CHEMICALS INC, Individually ans as successor-in-interest to Sterling Chemicals Holdings Incorporated
Defendant - Appellee

Kerry E. Notestine, Attorney
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[COR LD NTC Retained]
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[COR NTC Retained]
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1301 McKinney Street
Houston, TX 77010-0000

STERLING CHEMICALS INCORPORATED EMPLOYEE BENEFITS PLANS COMMITTEE, in its capacity as Plan Administrator of the Sterling Chemicals Incorporated Medical benefits Plan for Salaried Employees and the Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees
Defendant - Appellee

Kerry E. Notestine, Attorney
Direct: 713-652-4748
[COR LD NTC Retained]
(see above)

Kelley Riddle Edwards
Direct: 713-652-4702
[COR NTC Retained]
(see above)

STERLING CHEMICALS INCORPORATED MEDICAL BENEFITS PLAN FOR SALARIED EMPLOYEES
Defendant - Appellee

Kerry E. Notestine, Attorney
Direct: 713-652-4748
[COR LD NTC Retained]
(see above)

Kelley Riddle Edwards
Direct: 713-652-4702
[COR NTC Retained]
(see above)

STERLING CHEMICALS INCORPORATED PRESCRIPTION DRUG BENEFITS PLAN FOR SALARIED EMPLOYEES
Defendant - Appellee

Kerry E. Notestine, Attorney
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[COR LD NTC Retained]
(see above)

Kelley Riddle Edwards
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[COR NTC Retained]
(see above)

STERLING CHEMICALS INCORPORATED MEDICAL BENEFITS
PLAN FOR RETIREES
Defendant - Appellee

Kerry E. Notestine, Attorney
Direct: 713-652-4748
[COR LD NTC Retained]
(see above)

Kelley Riddle Edwards
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[COR NTC Retained]
(see above)

STERLING CHEMICALS INCORPORATED PRESCRIPTION
DRUG BENEFITS PLAN FOR RETIREES
Defendant - Appellee

Kerry E. Notestine, Attorney
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[COR LD NTC Retained]
(see above)

Kelley Riddle Edwards
Direct: 713-652-4702
[COR NTC Retained]
(see above)

ROBERT E. EVANS; RELMOND H. HAMILTON; DENNIS HARTHUN,

Plaintiffs - Appellants

v.

STERLING CHEMICALS, INCORPORATED, Individually and as successor-in-interest to Sterling Chemicals Holdings Incorporated; STERLING CHEMICALS INCORPORATED EMPLOYEE BENEFITS PLANS COMMITTEE, in its capacity as Plan Administrator of the Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees and the Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees; STERLING CHEMICALS INCORPORATED MEDICAL BENEFITS PLAN FOR SALARIED EMPLOYEES; STERLING CHEMICALS INCORPORATED PRESCRIPTION DRUG BENEFITS PLAN FOR SALARIED EMPLOYEES; STERLING CHEMICALS INCORPORATED MEDICAL BENEFITS PLAN FOR RETIREES; STERLING CHEMICALS INCORPORATED PRESCRIPTION DRUG BENEFITS PLAN FOR RETIREES,

Defendants - Appellees

07/21/2010		PRIVATE CIVIL FEDERAL CASE docketed. NOA filed by Appellants Mr. Robert E. Evans, Mr. Relmond H. Hamilton and Mr. Dennis Harthun [10-20493] (RJd) 30 pg, 1.84 MB
07/22/2010		CASE CAPTION updated. Additional appeal filed. [6587696-2] NOA filed by Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun. [6587696-1] [10-20493] (RJd) 29 pg, 1.94 MB
07/28/2010		INITIAL CASE CHECK by Attorney Advisor complete, Action: Case OK to Process for appeals docketed on 7/21/10 and 7/22/10 . [6592037-2] Initial AA Check Due satisfied.. Notice of Certified ROA due on 08/12/2010. [10-20493] (SAT) 1 pg, 94.41 KB
08/18/2010		EXTENSION OF TIME GRANTED to the District Court to prepare the Certified ROA until 09/02/2010. Notice of Certified ROA due on 09/02/2010 [10-20493] (email sent to DC) (DDK)
08/19/2010		NOTICE RECEIVED FROM DISTRICT COURT. Record Part: ROA Certified by DCt, Action Type: FILED Certified ROA due deadline satisfied. [10-20493] (SBS)
08/20/2010		BRIEFING NOTICE ISSUED A/Pet's Brief Due on 09/29/2010 for Appellant Robert E. Evans, Appellant Relmond Hamilton and Appellant Dennis Harthun. [10-20493] (SBS) 3 pg, 91.53 KB
08/30/2010		APPEARANCE FORM FILED by Attorney(s) Russell Stanley Post for party(s) Dennis Harthun, Relmond Hamilton, and Robert E. Evans, in case 10-20493 [10-20493] (SBS)
08/30/2010		APPEARANCE FORM FILED by Attorney(s) Chad Flores for party(s) Dennis Harthun, Relmond Hamilton, and Robert E. Evans, in case 10-20493 [10-20493] (SBS)
09/15/2010		APPEARANCE FORM FILED by Attorney Kelley Riddle Edwards for Appellee(s) Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Inc in 10-20493 [10-20493] (SBS)
09/15/2010		APPEARANCE FORM FILED by Attorney(s) Stefanie R. Moll for Appellee(s) Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees, Sterling Chemicals Inc., Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, in case 10-20493 [10-20493] (SBS)
09/15/2010		APPEARANCE FORM FILED by Attorney(s) Kerry E. Notestine for Appellee(s) Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees, Sterling Chemicals Inc, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, in case 10-20493 [10-20493] (SBS)
09/22/2010		PHONE EXTENSION CONFIRMED for Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun. Extension granted to and including 10/29/2010. A/Pet's Brief deadline updated to 10/29/2010 for Appellant Robert E. Evans, Appellant Relmond Hamilton and Appellant Dennis Harthun [10-20493] (JMW)
10/21/2010		UNOPPOSED MOTION filed by Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun to extend time to file brief as appellant until 12/03/2010 [6655670-2]. Date of service: 10/21/2010 via email - Attorney for Appellant(s): Flores, Post, Weber; Attorney for Appellee(s): Edwards, Moll, Notestine [10-20493] (Russell Stanley Post) 6 pg, 35.84 KB
10/22/2010		CLERK ORDER granting in part motion to extend time to file appellant's brief filed by Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun [6655670-2] A/Pet's Brief deadline updated to 11/15/2010 for Appellant Robert E. Evans, Appellant Relmond Hamilton and Appellant Dennis Harthun. [10-20493] (SBS) 1 pg, 74.73 KB
11/08/2010		UNOPPOSED MOTION filed by Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun to extend time to file brief as appellant until 11/19/2010 [6669488-2]. Date of service: 11/08/2010 via email - Attorney for Appellant(s): Flores, Post, Weber; Attorney for Appellee(s): Edwards, Moll, Notestine [10-20493] (Russell Stanley Post) 5 pg, 33.83 KB
11/09/2010		CLERK ORDER granting motion to extend time to file appellant's brief filed by Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun [6669488-2] A/Pet's Brief deadline updated to 11/19/2010 for Appellant Robert E. Evans, Appellant Relmond Hamilton and Appellant Dennis Harthun. [10-20493] (SBS) 1 pg, 74.65 KB
11/19/2010		APPELLANT'S BRIEF FILED by Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun Date of service: 11/19/2010 via email - Attorney for Appellant(s): Flores, Post, Weber; Attorney for Appellee(s): Edwards, Moll, Notestine [10-20493] REVIEWED AND/OR EDITED. # of Copies Provided: 0. A/Pet's Brief deadline satisfied. Appellee's Brief due on 12/22/2010 for Appellee Sterling Chemicals Inc, Appellee 61 pg, 220.54 KB

		Sterling Chemicals Incorporated Employee Benefits Plans Committee, Appellee Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, Appellee Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Appellee Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees and Appellee Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees. Paper Copies of Brief due on 11/29/2010 for Appellant Robert E. Evans, Appellant Relmond Hamilton and Appellant Dennis Harthun. [10-20493] (Russell Stanley Post)
11/19/2010	 115 pg, 5.55 MB	RECORD EXCERPTS FILED by Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun. Date of service: 11/19/2010 via email - Attorney for Appellant(s): Flores, Post, Weber; Attorney for Appellee(s): Edwards, Moll, Notestine [10-20493] REVIEWED AND/OR EDITED. # of Copies Provided: 0. Paper Copies of Record Excerpts due on 11/29/2010 for Appellant Robert E. Evans, Appellant Relmond Hamilton and Appellant Dennis Harthun. [10-20493] (Russell Stanley Post)
11/24/2010		Paper copies of appellant brief filed by Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun in 10-20493 received. Paper copies match electronic version of document? Yes # of Copies Provided: 7. Paper Copies of Brief due deadline satisfied. [10-20493] (BCL)
11/24/2010		Paper copies of record excerpts filed by Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun in 10-20493 received. Paper copies match electronic version of document? Yes # of Copies Provided: 4. Paper Copies of Record Excerpts due deadline satisfied. [10-20493] (BCL)
12/13/2010	 4 pg, 13.57 KB	UNOPPOSED MOTION filed by Appellees Sterling Chemicals Inc, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees and Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees to extend time to file brief of appellee until 01/19/2011 [6692815-2]. Date of service: 12/13/2010 via email - Attorney for Appellant(s): Flores, Post, Weber; Attorney for Appellee(s): Edwards, Moll, Notestine [10-20493] (Stefanie R. Moll)
12/13/2010	 1 pg, 76.29 KB	CLERK ORDER granting motion to extend time to file appellee's brief filed by Appellees Sterling Chemicals Inc, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees and Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees [6692815-2] E/Res's Brief deadline updated to 01/21/2011 for Appellee Sterling Chemicals Inc, Appellee Sterling Chemicals Incorporated Employee Benefits Plans Committee, Appellee Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, Appellee Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Appellee Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees and Appellee Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees. [10-20493] (SBS)
01/21/2011	 65 pg, 307.42 KB	APPELLEE'S BRIEF FILED by Appellees Sterling Chemicals Inc, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees and Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees Date of service: 01/21/2011 via email - Attorney for Appellant(s): Flores, Post, Weber; Attorney for Appellee(s): Edwards, Moll, Notestine [10-20493] REVIEWED AND/OR EDITED. APPELLEE'S BRIEF FILED. # of Copies Provided: 0. E/Res's Brief deadline satisfied. Reply Brief due on 02/07/2011 for Appellant Robert E. Evans, Appellant Relmond Hamilton and Appellant Dennis Harthun. Paper Copies of Brief due on 01/31/2011 for Appellee Sterling Chemicals Inc, Appellee Sterling Chemicals Incorporated Employee Benefits Plans Committee, Appellee Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, Appellee Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Appellee Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees and Appellee Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees. [10-20493] (Kerry E. Notestine)
01/25/2011		Paper copies of appellee brief filed by Appellees Sterling Chemicals Inc, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees and Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees in 10-20493 received. Paper copies match electronic version of document? Yes. # of Copies Provided: 7. Paper Copies of Brief due deadline satisfied. [10-20493] (SBS)
01/31/2011		PHONE EXTENSION CONFIRMED for Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun. Extension granted to and including 02/14/2011. Reply Brief deadline updated to 02/14/2011 for Appellant Robert E. Evans, Appellant Relmond Hamilton and Appellant Dennis Harthun [10-20493] (LBM)
01/31/2011	 4 pg, 31.4 KB	UNOPPOSED MOTION filed by Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun to extend time to file reply brief until 02/22/2011 [6728996-2]. Date of service: 01/31/2011 via email - Attorney for Appellant(s): Flores, Post, Weber; Attorney for Appellee(s): Edwards, Moll, Notestine [10-20493] (Russell Stanley Post)
02/01/2011	 1 pg, 109.03 KB	

CLERK ORDER granting motion to extend time to file reply brief filed by Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun [6728996-2] Reply Brief deadline updated to 02/22/2011 for Appellant Robert E. Evans, Appellant Relmond Hamilton and Appellant Dennis Harthun. [10-20493] (AS)

02/21/2011		38 pg, 180.77 KB	APPELLANTS REPLY BRIEF FILED by Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun Date of service: 02/21/2011 via email - Attorney for Appellant(s): Flores, Post, Weber; Attorney for Appellee(s): Edwards, Moll, Notestine [10-20493] REVIEWED AND/OR EDITED. # of Copies Provided: 0. Reply Brief deadline satisfied. Paper Copies of Brief due on 02/28/2011 for Appellant Robert E. Evans, Appellant Relmond Hamilton and Appellant Dennis Harthun. [10-20493] (Russell Stanley Post)
02/24/2011			Paper copies of appellant reply brief filed by Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun in 10-20493 received. Paper copies match electronic version of document? Yes. # of Copies Provided: 7. Paper Copies of Brief due deadline satisfied. [10-20493] (SBS)
02/24/2011			RECORD ON APPEAL REQUESTED FROM DISTRICT COURT. ROA due on 03/11/2011 [10-20493] (SBS)
02/24/2011			Exhibits, 1 box (Jury Trial Exhibits), FILED [10-20493] (SBS)
03/14/2011			EXTENSION OF TIME GRANTED to the District Court to prepare the ROA until 03/29/2011. 2nd Request. Record on Appeal deadline updated to 03/29/2011 [10-20493] (AS)
03/24/2011			RECORD ON APPEAL FILED. Electronic Pleadings, 21; Electronic Transcript, 3; ROA deadline satisfied. [10-20493] (SBS)
06/06/2011		1 pg, 64.93 KB	CASE TENTATIVELY calendared for oral argument for the week of 08/01/2011. [10-20493] (GAM)
06/08/2011		1 pg, 65.16 KB	TENTATIVE CALENDAR changed from week of 08/01/2011 to week of 08/29/2011. With Argument? Yes. [10-20493] (GAM)
06/08/2011		2 pg, 98.45 KB	ATTORNEY NOT PARTICIPATING. Stefanie Moll is designated as inactive in this case. Reason: no longer with law firm. [10-20493] (AS)
07/12/2011			CASE CALENDARED for oral argument on Wednesday, 08/31/2011 in New Orleans in the En Banc Courtroom -- AM session. In accordance with our policy, lead counsel only will receive via email at a later date a copy of the court's docket and an acknowledgment form. All other counsel of record should monitor the court's website for the posting of the oral argument calendars.. [10-20493] (VLB)
08/08/2011		2 pg, 35.51 KB	SUPPLEMENTAL AUTHORITIES (FRAP 28j) FILED by Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun Date of Service: 08/08/2011 via email - Attorney for Appellants: Flores, Post, Weber; Attorney for Appellees: Edwards, Notestine [10-20493] (Russell Stanley Post)
08/12/2011		2 pg, 69.35 KB	LETTER filed by Appellees Sterling Chemicals Inc, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees and Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees Date of Service: 08/12/2011 via email - Attorney for Appellants: Flores, Post, Weber; Attorney for Appellees: Edwards, Notestine [10-20493] (Kerry E. Notestine)
08/30/2011		2 pg, 56.05 KB	LETTER filed by Appellees Sterling Chemicals Inc, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees and Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees Date of Service: 08/30/2011 via email - Attorney for Appellants: Flores, Post, Weber; Attorney for Appellees: Edwards, Notestine [10-20493] (Kerry E. Notestine)
08/30/2011		2 pg, 35.87 KB	SUPPLEMENTAL AUTHORITIES (FRAP 28j) FILED by Appellants Mr. Robert E. Evans, Mr. Relmond Hamilton and Mr. Dennis Harthun in Response to Appellees' 8/30/11 Rule 28j Letter Date of Service: 08/30/2011 via email - Attorney for Appellants: Flores, Post, Weber; Attorney for Appellees: Edwards, Notestine [10-20493] (Russell Stanley Post)
08/31/2011			ORAL ARGUMENT HEARD before Judges Jolly, DeMoss, Prado. Arguing Person Information Updated for: Kerry E. Notestine arguing for Appellee Sterling Chemicals Inc, Appellee Sterling Chemicals Incorporated Employee Benefits Plans Committee, Appellee Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, Appellee Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Appellee Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees, Appellee Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees; Arguing Person Information Updated for: Russell Stanley Post arguing for Appellant Robert E. Evans, Appellant Relmond Hamilton, Appellant Dennis Harthun [10-20493] (PFT)
10/13/2011		27 pg, 504.99 KB	PUBLISHED OPINION FILED. [10-20493 Reversed and Remanded] Judge: EGJ , Judge: HRD , Judge: ECP Mandate pull date is 11/03/2011 [10-20493] (JMA)
10/13/2011		2 pg, 62.36 KB	JUDGMENT ENTERED AND FILED. [10-20493] (JMA)

10/27/2011	 38 pg. 1.15 MB	PETITION filed by Appellees Sterling Chemicals Inc, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees and Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees for rehearing en banc [6937608-2]. Date of Service: 10/27/2011 via email - Attorney for Appellants: Flores, Post, Weber; Attorney for Appellees: Edwards, Notestine [10-20493] (Kerry E. Notestine)
10/28/2011	 1 pg. 65.6 KB	PAPER COPIES REQUESTED for the petition for rehearing en banc filed by Appellees Sterling Chemicals Inc, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees and Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees in 10-20493 [6937608-2]. Mandate pull date canceled.. Paper Copies of Rehearing due on 11/02/2011 for Appellees Sterling Chemicals Inc, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees. [10-20493] (BCL)
11/01/2011		Paper copies of petition for rehearing en banc filed by Appellees Sterling Chemicals Inc, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees and Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees in 10-20493 received. Paper copies match electronic version of document? Yes # of Copies Provided: 20. Paper Copies of Rehearing due deadline satisfied. [10-20493] (BCL)
11/14/2011	 3 pg. 102.86 KB	COURT ORDER denying petition for rehearing en banc filed by Appellees Sterling Chemicals Inc, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees and Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees [6937608-2] Without Poll. Mandate pull date is 11/21/2011 [10-20493] (BCL)
11/22/2011	 2 pg. 133.87 KB	MANDATE ISSUED. Mandate pull date satisfied. [10-20493] (BCL)
02/16/2012	 1 pg. 41.63 KB	SUPREME COURT NOTICE that petition for writ of certiorari [7019312-2] was filed by Appellees Sterling Chemicals Inc, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees and Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees on 02/10/2012. Supreme Court Number: 11-1001. [10-20493] (LGL)
03/19/2012	 2 pg. 98.57 KB	SUPREME COURT ORDER received denying petition for writ of certiorari filed by Appellees Sterling Chemicals Inc, Sterling Chemicals Incorporated Employee Benefits Plans Committee, Sterling Chemicals Incorporated Medical Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Salaried Employees, Sterling Chemicals Incorporated Medical Benefits Plan for Retirees and Sterling Chemicals Incorporated Prescription Drug Benefits Plan for Retirees in 10-20493 on 03/19/2012. [7042244-1] [10-20493] (DSE)

- Documents and Docket Summary**
 Documents Only

Include Page Numbers

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Description:	Docket Report (full)	Search Criteria:	10-20493
Billable Pages:	7	Cost:	0.70

EXHIBIT 4

CROWLEY NORMAN LLP
TIME RECORDS
EVANS V. STERLING

Matter: Evans v. Sterling Chemicals

Inception: Jan. 1, 2007

Fee type: Class action; contingent

Atty.: R. Martin Weber, Jr.

2007	1/22/2007	Initial discussion of case with Walt (.9)	0.90
	1/26/2007	Receipt and review of memorandum and case materials (1.4)	1.40
	1/29/2007	Receipt and review of email and multiple attachments (.8)	0.80
	2/5/2007	Draft and send email to Walt (.2)	0.20
	2/9/2007	T/c with Walt re: Halliburton case and issues re: bankruptcy effect on APA (.2); started review of documents (1.7)	1.90
	2/11/2007	Continued review of documents and made notes re: questions to be addressed in pleadings	0.80
	2/12/2007	Receipt and review of co-counsel agreement (.2); respond to Walt re: same (.1); receipt and review of draft complaint and draft chronology (.9)	1.20
	2/14/2007	Receipt and review of Halliburton per curiam opinion (.3); emails re: same; call with WR (.9)	1.20
	2/15/2007	Draft and revise complaint (2.3); t/c (multiple) and emails (multiple) with co-counsel re: complaint; conference call with co-counsel (1.2)	3.50
	2/16/2007	Continued to draft and revise complaint (3.1); t/c (multiple) and emails (multiple) with co-counsel re: complaint; researched proper service requirements (.8); prepared documents for filing and filed same (1.5)	5.40
	2/19/2007	T/C with co-counsel re: class definition (1.0); reviewed draft of same (.2); emails re: same (.2)	1.40
	2/20/2007	Draft and revise complaint and attention to filing of same (2.0); t/c with co-counsel re: service issues (.8); research re: 11 USC 1114 (.2); receipt and review of paper on ERISA causes of action (.1); reviewed emails with clients (.1)	3.20
	2/21/2007	T/c with co-counsel re: complaint (.3); review of ERISA articles (.6); attention to perfecting service on defendants (.4)	1.30
	2/22/2007	Drafted, revised and filed amended complaint	2.40
	2/23/2007	Attention to filing return of service	0.20
	2/28/2007	Emails regarding drafting and filing of certificate of service	0.20
	3/2/2007	Draft, finalize and file certificate of interested persons	0.50
	3/12/2007	Review of email from client	0.10
	3/13/2007	Receipt and review of Defendants' answer (.7); t/c with co-counsel re:same (.3); research re: defense counsel (.4)	1.40

CROWLEY NORMAN LLP
TIME RECORDS
EVANS V. STERLING

3/14/2007	Discussion with Walt Roper re: scheduling issues and items to be accomplished prior to scheduling hearing (.2); research re: Halliburton issues (1.0)	1.20
3/16/2007	T/c with co-counsel re: Halliburton status	0.20
3/20/2007	Receipt and review of email regarding other class members	0.10
4/4/2007	Receipt and review of email (.2); t/c with WR (.7)	0.90
4/10/2007	Receipt and review of email (.2); call with Walt re Rule 26 matters (.2)	0.40
4/13/2007	Receipt and review of email (.2); call with co-counsel (.3); participated in Rule 26(f) conference (.7)	1.20
4/18/2007	Receipt and review of email (.2); reviewed draft of joint discovery plan and responded with comments (.5)	0.70
4/20/2007	Receipt and review of Defendants' filing (.2); receipt and review of emails re: joint filing (.2); edited Rule 26(f) report (.4)	0.80
4/25/2007	Receipt and review of Defendants emails (.3); receipt and review of emails re: proposed changes to joint filing (.5); review of final filing (.3)	1.10
5/4/2007	Review of emails and attachments from co-counsel	0.20
5/7/2007	Conference with Walt Roper re: Sterling Fibers (.6); set up teleconference (.1); t/c with Court re: scheduling (.3); t/c with co-counsel re: expert issues and to-do list (.7)	1.70
5/8/2007	Investigation of possible experts (.3); review of emails; draft emails (.2); review of Halliburton pleadings (.3)	0.80
5/11/2007	Receipt and calendaring of court order re: dates	0.20
5/14/2007	Emails re: case (.2); reviewed documents (.9)	1.10
5/15/2007	Reviewed purchase agreement (1.0); reviewed 10-K (.3); t/c with Walt (.1)	1.40
5/16/2007	Reviewed documents with analysis of bankruptcy rejection of claim	0.50
5/18/2007	Conference with Walt and Karla re initial disclosures (.8); reviewed draft of same (.5)	1.30
5/21/2007	Reviewed document for privilege, and sorted them for production (3.2); reviewed documents for list of persons with knowledge of relevant facts (1.2); prepared final version of initial disclosures (.5); prepared damage calculations for named class representatives for inclusion in disclosures (1.5)	6.40
5/22/2007	T/c with WR regarding whether to dismiss Sterling Fibers from suit (.5); emails regarding obtaining Fibers agreement (.3)	0.80

CROWLEY NORMAN LLP
TIME RECORDS
EVANS V. STERLING

5/24/2007	Review of Sterling Fibers purchase agreement (.6); t/c and emails with Walt re: dismissal of Sterling Fibers (.3); began review of procedural requirements for dismissal (.2)	1.10
5/25/2007	Continued legal research of dismissal requirements in class action (.8); drafted motion to dismiss (.9); email to opposing counsel re: whether they were opposed to motion (.1); t/c with Kerry Notestine re: whether they were opposed to motion and issues regarding agreed preliminary injunction against raising premiums for class members (.5)	2.30
5/30/2007	Emails with Eve McFadden re: dismissal of Sterling Fibers	0.30
5/31/2007	Draft and revise motion to dismiss Sterling Fibers, Inc. and attention to filing same (1.0); draft and revise proposed order (.2)	1.20
6/5/2007	Receipt and review of signed order on dismissal	0.10
6/6/2007	Review of emails to clients re: status (.1); t/c with WR re: Sterling intention to raise rates again (.4); email to KN re: same (.1)	0.60
6/7/2007	Review of email from KN re: agreed injunction	0.10
6/13/2007	Draft and revise amended complaint and circulate same for comments	1.40
6/14/2007	Draft and revise amended complaint	0.60
6/15/2007	Draft and revise and file Amended Complaint	1.50
6/18/2007	Draft and revise requests for production	2.60
6/19/2007	Draft and revise requests for production (1.1); emails and attention to finalizing co-counsel agreement (.3)	1.40
6/26/2007	Emails with Nitin Sud re: jury demand	0.30
6/28/2007	Receipt and review of amended answer (.4); review of affirmative defenses raised (.2)	0.60
7/2/2007	Receipt of edits to requests for production and made changes to document	0.40
7/6/2007	Receipt and initial review of motion to dismiss (.6); t/c with WR (.2)	0.80
7/9/2007	Continued review of motion to dismiss (1.0); review of exhibits to motion to dismiss (1.5); emails with co-counsel (.7)	3.20
7/10/2007	Legal research regarding bankruptcy issues (2.8); research regarding dismissal issues (1.4); beginning draft of response (1.1); emails with co-counsel (.2)	5.50
7/11/2007	Legal research regarding bankruptcy issues (2.7); worked on draft of response (1.8)	4.50
7/12/2007	Legal research regarding bankruptcy issues (2.6); worked on draft of response (1.0)	3.60
7/13/2007	Draft and revise response to motion to dismiss (2.9); receipt and review of multiple ALI-ABA seminar papers (.2); circulated draft for review (.1)	3.20

CROWLEY NORMAN LLP
TIME RECORDS
EVANS V. STERLING

7/16/2007	Draft and revise response to motion to dismiss (1.8); t/c with Walt regarding getting affidavits to support response (.3)	2.10
7/17/2007	Draft and revise response to motion to dismiss (3.6); emails with co-counsel regarding various elements of response (.3)	3.90
7/18/2007	Continued work on response to motion to dismiss	3.40
7/19/2007	Continued to draft and revise response to motion to dismiss (2.6); review of additional case law (.8); emails with WR (.2)	3.60
7/20/2007	Continued to draft and revise response to motion to dismiss (2.1); emails with Notestine re: motion for extension of page limits (.2)	2.30
7/23/2007	Draft and revise response to motion to dismiss (1.2); draft and forward declarations for clients for signature (3.3); emails with WR (.3)	4.80
7/24/2007	Draft and revise response to motion to dismiss (3.5); prepared exhibits (.6); worked with WR on pt. 2 of the motion regarding leave to amend (.5)	4.60
7/25/2007	Draft and revise response to motion to dismiss (1.7); draft and revise motion for leave to exceed page limits (1.0); continued compiling exhibits and attachments (.7)	3.40
7/26/2007	Finalize response incorporating changes from cocounsel (.6); attention to filing response to motion to dismiss and motion for leave (.5); draft and file proposed orders (.6); send emails to co-counsel (.5)	2.20
7/27/2007	Review two emails and attachments from co.counsel	0.10
7/30/2007	Review of email from WR	0.10
8/2/2007	Review of emails re: responses to requests for production	0.10
8/3/2007	Receipt and review of responses and objections to requests for productions (1.0); emails with Defendants re: production of documents (.2)	1.20
8/6/2007	Attention to obtaining copies of defendants documents	0.10
8/10/2007	T/C with Walt re: documents (.2); review and discussion of insurance policy (.3)	0.50
8/13/2007	Review of documents produced by Defendants (3.3); several t/c and emails with Walt re: supplementation of record of current motion with new documents (.2); research re: ERISA matter (1.3)	4.80
8/20/2007	Receipt of defendants' letter re: intention to file reply (.2); emails and calls with co-counsel regarding position on reply (.5)	0.70
8/22/2007	Receipt and review of Defendants' court filing	0.10
8/23/2007	Receipt and review of Court order on Motion to Dismiss (1.0); multiple t/c and emails with co-counsel (.4)	1.40
8/24/2007	Emails amongst co-counsel re: opinion	0.20

CROWLEY NORMAN LLP
TIME RECORDS
EVANS V. STERLING

8/27/2007	Emails regarding case status and scheduling	0.10
8/28/2007	Emails regarding case status and scheduling (.2); draft and revise amended complaint and motion to amend (2.0)	2.20
8/29/2007	Draft and revise amended complaint and motion to amend	1.20
8/30/2007	Emails and t/c with co-counsel (.2); finalized motion and complaint (1.0); forwarded same to co-counsel (.1)	1.10
9/4/2007	Emails with co-counsel re: drafts of motions and complaints (.1); forwarded draft and email to opposing counsel (.2)	0.30
9/5/2007	Draft and revise motion to amend (.8); draft and revise amended complaints (1.1); emails and receipt of edits (.1); edited documents (.3)	2.30
9/6/2007	Email with Notestine re: extension	0.10
9/7/2007	Emails and review of revised motion (1.0); correspondence re: deposition scheduling (.2); attention to finalizing and filing motion to amend (.1); receipt and review of motion for reconsideration (.3)	1.60
9/8/2007	Continued review and analysis of motion for reconsideration (.8); legal research and review of cases cited in motion (1.6)	2.40
9/11/2007	Emails with Nitin Sud re: documents (.1); receipt and review of order (.1)	0.20
9/12/2007	Emails with co-counsel re: dispute over location of depositions (.2); legal research re: issues raised in reconsideration motion (.5)	0.70
9/13/2007	Discussion of document production issues with co-counsel (.25)	0.25
9/14/2007	Emails regarding motion for reconsideration (.2); continued discussion of challenging location of depositions (.2)	0.40
9/17/2007	Draft and revise the 3rd Amended Complaint; attention to filing same (1.5); emails with KN re: accepting service of same (.1); email with co-counsel re: status of response to reconsideration (.1)	1.70
9/18/2007	Emails with co-counsel re: response to motion	0.20
9/19/2007	Worked on response to motion for reconsideration	2.20
9/20/2007	Worked on response to motion for reconsideration (1.4); emails re: same (.2)	1.60
9/21/2007	Continued legal research and drafting of response to motion for reconsideration	2.30
9/24/2007	Continued to draft and revise response (1.4); emails re: same (.1); circulated draft for comments (.1); emails re: document production (.2)	1.80

CROWLEY NORMAN LLP
TIME RECORDS
EVANS V. STERLING

9/25/2007	Continued to draft and revise response (2.1); emails re: same(.1); circulated draft for comments(.1); emails re: document production(.2); reviewed draft of document letter and edits to same(.6)	3.10
9/26/2007	Reviewed Walts comments to response and incorporated same into document(.5); reviewed Karla's emails re: discovery matters (.2)	0.70
9/27/2007	Finalized and filed response to motion for reconsideration (1.1); finalized exhibits (.2)	1.30
10/1/07	Receipt and review of Court's order on motion for reconsideration (.4); t/c with co-counsel re: Judge's Order in the Sterling case (.2)	0.60
10/2/07	Conference call with co-counsel re: case development	0.50
10/4/07	Prepared subpoena to serve on Byron Haney and subpoena duces tecum (.9); emails re: depositions (.2)	1.10
10/8/07	Review of documents produced by Defendants (1.2); emails regarding letter on motion to compel production (.1); review of documents from clients (.8)	2.10
10/9/07	Reviewed documents 1.5); extended conference call with co-counsel (.6); review of the Halliburton settlement that is being proposed (.7)	2.80
10/10/07	T/C with Walt re: experts	0.20
10/11/07	Emails re: depositions and motions to compel	0.40
10/12/07	Emails re: depositions; attention to filing of waivers of service	0.30
10/16/07	Review of email re scheduling of depositions (.1); emails re: experts(.1); review of expert materials (.2)	0.40
10/17/07	Tc with Walt re deposition schedule (.2); emails re: depositions (.1)	0.30
10/19/07	Emails with Walt regarding experts	0.10
10/22/07	Emails with KJ re: documents produced (.1); receipt of letter from KN (.1)	0.20
10/23/07	Worked on scheduling depositions and emails re: same	0.20
10/26/07	Receipt and review of cases to be used in briefing	0.50
10/29/07	Tc with Walt re: expert witnesses (.2); t.c re: "vesting" (.2); legal research re: vesting (1.3); emails re class cert issues (.2)	1.90
10/31/07	T/c with co-counsel re: expert witnesses (.5); continued research re: vesting (.6)	1.10
11/1/07	Tc with Walt re letter from Notestine (.2); review of Walt's revisions to same (.1); research into letter agreements to enjoin certain acts and enforceability thereof (1.3)	1.60
11/5/07	Emails and analysis of requests for production and responses to same	0.50
11/6/07	Receipt and review of ERISA materials re: remedies and claims (.2); multiple emails re: motion to compel (.2)	0.40

CROWLEY NORMAN LLP
TIME RECORDS
EVANS V. STERLING

11/7/07	Tc with Walt re: retaining Adam Reese as expert (.3); multiple emails and review of draft discovery responses and draft motion to compel (.8); emails re: experts (.3)	1.40
11/8/07	Tc with Walt re: additional expert in addition to Reese (.9); multiple emails regarding negotiation on motion to compel issues (.2)	1.10
11/9/07	Worked on letter agreement with KN re: agreed injunction (1.3); emails re: same (.2)	1.50
11/12/07	Continued negotiations on letter (.4); emails re: letter agreement and re: experts (.2)	0.60
11/13/07	Continued negotiations on letter (.8); emails re: letter agreement (.2); draft and revise same (.3)	1.30
11/14/07	Continued drafting and revising agreement (.6); emails re: same (.1); emails and negotiation of document production (.2)	0.90
11/19/07	Emails with KN re: agreement (.2); emails with co-counsel regarding outstanding issues (.1)	0.30
11/20/07	Emails and conferences in preparation for filing motion to compel and other document production issues	0.40
11/21/07	Tc with co-counsel re: hiring experts (.2); emails re: motion for interlocutory appeal (.4); receipt and review of motion (.8)	1.80
11/26/07	Tc with Walt re: affirmative defenses	0.80
11/29/07	T/C with Walt re: development of damage model for case (.6); worked on damage models (2.6); emails re: same (.2)	3.40
11/30/07	T/C with Walt re: development of damage model for case (.2); discussion re experts (.1); reviewed documents and prepared mock outlines to prep clients for deposition (2.0); worked with KJ on client document production issues (.7); reviewed documents for privilege and confidential matters (2.8); receipt and review of response to motion to compel (.4)	6.20
12/2/07	Document review (3.4); preparation of spreadsheets to use with clients re damages (2.0); review of documents in preparation for depositions (1.1)	6.50
12/3/2007	Meeting with clients in advance of depositions (6.2); worked on document production (2.3)	8.50
12/4/2007	Prepared clients for deposition (3.2); reviewed documents to be produced in response to subpoena duces tecum (2.1); prepared objections to subpoena duces tecum (1.1)	6.40
12/5/2007	Prepared clients for deposition (3.2); reviewed documents to be produced in response to subpoena duces tecum (3.1); prepared objections to subpoena duces tecum (.8); researched cases re: request for interlocutory appeal (.9); receipt and review of order on motion to compel (.4)	8.40
12/6/2007	Prepared and presented Pl. Harthun for his deposition (5.8); meeting with clients (1.0)	6.80

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2008	12/10/2007	Worked on motion for extension of time to respond to request for interlocutory appeal (.1); put together package for expert (.24); emails with co-counsel regarding standard for pending motion and responses thereto (.2)	3.70
	12/14/2007	Worked on response to motion for interlocutory appeal (.24); emails re: same (.2)	2.60
	12/17/2007	T/c with Walt re changes to response (.4); worked on response and finalized for filing (2.8)	3.20
	12/19/2007	T/c with Walt re Adam Reese discussion (.2); emails with KN re: corporate rep. depo (.2); worked on outline of topics for corp. rep. depo (.5)	0.90
	12/20/2007	Emails re: expenses and expert findings	0.30
	12/26/2007	Emails with KN re: documents	0.10
	12/27/2007	Receipt and review of multiple emails re: damages and document production (.3); sent emails re: same (.1)	0.40
	12/28/2007	Emails with KN re: depositions of corporate rep. (.2); receipt and review of Def's reply brief (.5)	0.70
	12/31/2007	Emails re: reply brief filed by Defendants (.1); emails with KN re: depositions (.2)	0.30
	1/2/2008	Worked on preparation for corporate rep. depo 1.4); emails with co-counsel regarding items and analysis needed (.2)	1.60
	1/4/2008	Emails with clients (.2); receipt and review of client depositions (.5)	0.70
	1/7/2008	T/c with Walt re Reese expert report (.3); emails with Nitin re: corp. rep depo (.2); receipt and review of documents produced in prep for corp. rep depo (1,3)	1.80
	1/8/2008	T/c with Walt re Reese expert report (.2); emails re: document production (.1)	0.30
	1/9/2008	Tc with Walt re: bankruptcy expert (.2); t/c with Steege (.7); receipt and review of order denying motion for interlocutory appeal (.2); emails re: same (.2); compiled documents to send Steege (.5)	1.80
	1/10/2008	Draft and send emails re: extension of expert deadlines (.1); emails and conferences with Kerry regarding deposition issues with corporate rep. (.5); draft and revise motion for extension of time (.8)	1.40
	1/11/2008	Emails with co-counsel regarding order (.2); division of labor for MSJ and related motions (.2); receipt and review of order from court on extension (.1); attention to calendaring matters (.2); initial legal research on certification (1.7); receipt and review of draft of expert report (.8)	3.20
	1.14.08	Continued review and analysis and edits to Reese expert report (.8); t/c with co-counsel (.2); emails to KN re: witness availability and issues (.2)	1.20

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1.15.08	Extended discussion with KN re: bifurcation and settlement issues (.5); draft extended e-mail to co-counsel re: same (.3); receipt and review of discovery responses (1.2); t/c with co-counsel (.6)	2.60
1.16.08	Receipt and review of supplemental discovery (.4); t/c with co-counsel (.2); receipt and review of revised expert report (.2); emails with KN regarding depositions (.1)	0.90
1.17.08	Worked on Reese expert report issues (.8); legal research on MSJ issues (1.3)	2.10
1/18/2008	Emails and t/c with Steege re: report (.4); worked with Reese on expert report issues (1.0); emails with KN re: witness availability (.2); worked on MSJ (1.5)	3.10
1/19/2008	Receipt and review of emails and Reese report (.1); reviewed same (.4)	0.50
1/21/2008	Receipt and review of Steege report (.4); prepared and filed designation of expert witnesses (1.7); emails and t/c with Rex Burch (.5); gathered exhibits for designation (1.6)	4.20
1/22/2008	Worked on MSJ outline and fact background (3.7); circulated same (.1)	3.80
1/23/2008	Receipt and review of draft sections of MSJ briefing from co-counsel (1.4); reviewed same and conducted additional research (1.2)	2.60
1/24/2008	Compose and send multiple emails	0.50
1/28/2008	Worked on compiling exhibits for MSJ (1.3); drafted and revised MSJ (1.9)	3.20
1/29/2008	Worked on compiling exhibits for MSJ (.3); reviewed documents produced by Plaintiffs (1.2); drafted and revised MSJ (3.0)	4.50
1/30/2008	Worked on compiling exhibits for MSJ (.4); reviewed documents produced by Defendants (.7); worked on drafting and revising MSJ (4.1)	5.20
1/31/2008	Multiple emails and t/c with co-counsel re: motions (.5); draft and revise motion for summary judgment (1.2); researched affirmative defenses of Statute of Limitations and wrote 15(c) section of motion (3.1)	4.80
2/1/2008	Multiple emails and t/c with co-counsel re: motions (.3); draft and revise motion for summary judgment (4.5); finalized and sent draft out to co-counsel for their review and comment (.2); emails with Steege re: expert affidavit (.2); reviewed proposed response to exhaustion section of brief (.4)	5.60
2/4.08	Draft and revise Motion for Class Cert (3.5); Draft and Revise Motion for Summary Judgment (3.0); worked on affirmative defense sections (1.0)	7.50
2/5/2008	Draft and revise Motion for Class Cert (2.7); Draft and Revise Motion for Summary Judgment (2.2); researched affirmative defenses (.2); email to Notestine re: motion for extension of page limits (.2)	5.30

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2/6/2008	Draft and revise Motion for Class Cert (1.2); Draft and Revise Motion for Summary Judgment (1.4); reviewed cases related to affirmative defenses (.8); worked on declarations for clients to sign re: documents (1.2); t/c with Roper (.2); worked on exhibits for Motion for Class cert (.8); drafted and revised motion for extension of page limits (.2)	5.80
2/7/2008	Draft and revise Motion for Class Cert (1.5); Draft and Revise Motion for Summary Judgment (1.6); worked on declarations for clients to sign re: documents (1.3); t/c with Roper (.3); emails to and from counsel (.2); t/c with Evans (.4); drafted and sent declaration to Lanthrip (.4); finalized exhibits (.6); emails with Steege re: declaration (.1); reviewed declaration of Steege (.4); emails with Roper re: exhaustion of remedies cases and discussion of defense (.2); filed motion for extension of page limits (.2)	7.30
2/8/2008	Attention to finalizing Motion for Class Cert and Motion for Summary Judgment (4.2); drafted proposed orders and finalized Weber declaration and Weber affidavit (1.7); t.c with Roper's office re: delcarations of clients (.2)	6.10
2/13/2008	Emails with Nitin Sud re: documents and protective order (.3); emails with co-counsel re: same (.2)	0.50
2/14/2008	Multiple emails re: Rebecca Hyzer and emails regarding protective order	0.70
2/15/2008	Additional emails re: Rebecca Hyzer deposition issue	0.40
2/21/2008	Receipt and review of defendants designation of experts (.5); receipt and review of defendants filings (.6); research on experts (.2)	1.30
2/25/2008	Emails and t/c with defense counsel re Hyzer deposition	0.40
2/26/2008	Emails with Nitin Sud re: Cytec documents	0.10
2/28/2008	Review of LaRue opinion (.4); emails re: same (.1); analysis of same (.2)	0.70
3/5/2008	Receipt and review of supplemental discovery responses (.8); updated damage information (.5)	1.30
3/10/2008	Emails with opposing counsel re discovery matters and motion to strike (.2); receipt and review of motions to strike (.7); receipt and review of responses to MSJ and designations (2.2)	3.10
3.11.08	Continued receipt and review of Defendants' filings and analysis of cases cited	1.40
3/12/2008	Multiple administrative emails	0.20
3.14.08	Continued review and analysis of matters raised in MSJ (1.2); conference with co-counsel re: same (.6)	1.80
3/17/2008	Review of MSJ response and began working on reply (.6); emails with Steege (.2)	0.80
3/18/2008	Draft and revise reply to MSJ and reply to class cert motion (3.2); conference with co-counsel (.3); legal research (.8)	4.30

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3/19/2008	Review of drafts of section of MSJ briefing and motion to abate (1.2); research and review of case law re: same (2.1); conferences with co-counsel (.4)	3.70
3/20/2008	Draft and revise replies and motion for stay (1.3); finalized all replies (2.2); finalized motion to stay (.6)	4.10
3/24/2008	Receipt and review of Def's response re: motion to stay (.4); multiple emails regarding handling (.2); receipt and revise draft notices re: same (.7)	1.30
3/25/2008	Receipt and review of order on motion to stay (.2); conference with co-counsel re same (.6)	0.80
3/27/2008	Receipt of drafts of administrative appeal matters prepared by Walt (.7); comments to same (.4)	1.10
3/28/2008	Receipt and review of final filing with administrator	0.20
4/1/2008	Conference call with Walt re mediation matters	0.50
4/8/2008	Receipt and review of response appeal (.5); receipt and review of motion for reconsideration of motion to stay (.4); t/c with co-counsel (.3); emails with co-counsel re: same (.2)	1.40
4/9/2008	Emails with WR re: motion for reconsideration	0.10
4/11/2008	Receipt and review on order for reconsideration	0.20
4/16/2008	Draft and revise emails to be sent to Defendant (.1); consult with co-counsel re: same (.3)	0.40
4/17/2008	Continued emails and revision of text to send to Defendant	0.30
4/18/2008	Attention to billing issues for experts	0.20
4/21/2008	T/c with Defendant and co-counsel re: mediation issues (.4); analysis of appeals issues (.1); emails and analysis regarding KN's version of a letter to be sent to the Plan Administrator (1.0)	1.50
4/22/2008	Emails with Defendant regarding position on statement to plan administrator (.1); review of materials provided (.5)	0.60
4/23/2008	Emails with KN regarding exchanges with Plan Administrator (.2); emails with KN and co-counsel re: mediation (.2)	0.40
4/24/2008	Emails regarding mediation and appeals issues	0.20
4/25/2008	Continued work on locating mediator and emails re: same	0.30
4/28/2008	Continued work on locating mediator and emails re: same	0.20
4/29/2008	Continued work on locating mediator and emails re: same	0.20
4/30/2008	Receipt and review of claim denial letter	0.10
5/1/2008	Emails regarding use of Nolland as mediator	0.10
5/2/2008	Emails regarding various mediators with KN	0.20
5/5/2008	Worked on setting up mediation	0.30
5/7/2008	Continued discussions re: mediator	0.20
5/8/2008	Continued discussions re: mediator	0.20
5/9/2008	Continued discussions re: mediator	0.10
5/14/2008	Emails with co-counsel and mediator	0.10

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5/16/2008	Review emails between Cytec and KN re: document requests (.1); conferences with WR re: same (.2)	0.30
5/21/2008	Attention to administrative matters re: expert bills and emails with co-counsel re: same	0.60
5/22/2008	Review of emails between Cytec and KN (.2); continued attention to administrative matters re: expenes (.1)	0.30
5/27/2008	T.c with co-counsel re mediation and settlement options (.2); multiple emails regarding mediation prep (.3); identified documents for inclusion in mediator memorandum and assisted in preparing same (.6); emails regarding claim deadlines (.2)	1.30
5/28/2008	Emails regarding mediation confidentiality agreement (.2); emails re: mediation details (.1)	0.30
5/29/2008	Made revisions to confidential mediation statement (2.2); receipt and review of premium information from Defendants (.9); emails and information exchanged with Plaintiffs (.3); emails re: mediation (.2)	3.60
5/30/2008	T/c with Walt and Mr. Evans re: mediation (.8); emails regarding mediator payment issues (.1)	0.90
5/31/2008	Worked to set up spreadsheets for use in mediation re: damage models	5.20
6.1.08	Worked to set up spreadsheets for use in mediation re: damage models	2.10
6.2.08	Attended mediation (10.2); post mediation meeting with co-counsel to discuss strategy (1.0)	11.20
6/3/2008	Emails with co-counsel and mediator	0.30
6/6/2008	Emails with KJ and WR regarding appeal of denial (.2); t/c with WR re: same (.3); receipt and review of draft appeal (.4); finalized letter (.7)	1.60
6.11.08	T/c with co-counsel re mediation and settlement options	0.75
6/13/2008	Emails setting up conference call	0.20
6/16/2008	T/c with WR and HG re: presentation for committee and related matters	0.80
6/17/2008	Emails re: experts invoices and KN discussions	0.20
6/19/2008	Review of case law regarding administrator breach of fiduciary duty	0.30
6/23/2008	Attention to review of emails and setting of conference with plan administrator	0.20
6/24/2008	Continued work on setting up meeting	0.10
6/26/2008	Receipt and calendaring of meeting date with Plan Committee	0.30
7/1/2008	T/c with WR re: benefits committee presentation (.5); worked on same (1.0)	1.50

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7/16/2008	Worked on compilation of spreadsheet re: all class members and known damage information	3.50
7/17/2008	Continued work on compilation of spreadsheet re: all class members and known damage information	2.60
7/22/2008	Continued work on spreadsheet (1.2); email with Nitin Sud re: same (.1)	1.30
7/23/2008	Receipt and review of revised spreadsheet from Nitin Sud (1.2); compared to original (.3); additional research into information (.1)	1.60
7/25/2008	Emails with Nitin Sud (.2); reviewed and revised spreadsheet (.9)	1.10
7.28.08	Worked with Walt on committee presentation (7.3); additional emails with Nitin Sud on damages spreadsheet (.3); emails regarding meeting details (.2)	7.80
7.29.08	Finalized presentation (.5); meeting with Defendants (5.0); worked on matters related to administrative proceedings (1.8)	7.30
7/31/2008	Review of settlement discussion emails	0.20
8/1/2008	Wrote extended email to clients regarding appeal hearing and settlement discussions (.5); receipt and review of responsive emails (.1)	0.60
8/5/2008	Reviewed emails and documentation from clients regarding status of benefits and changes to plans	0.60
8/12/2008	Receipt and review of denial of appeal (.2); t/c with WR (.5)	0.70
8/13/2008	Emails regarding status of settlement discussions	0.30
8/19/2008	Emails re: motion to lift stay and settlement	0.20
8/21/2008	Worked on agreed motion to lift stay and sent out for review	1.50
8/22/2008	Finalized motion to lift stay and filed same	1.20
8/25/2008	Receipt of order on motion to stay (.1); attention to scheduling (.1)	0.20
8/28/2008	T/c with Court re lifting stay and scheduling (.4); multiple emails with clients and co-counsel (.5); receipt of order and attention to scheduling (.4)	1.30
8/29/2008	Began work on supplemental briefing (2.9); emails with KN (.2)	3.10
9/3/2008	Worked on supplemental briefing on class cert and MSJ (4.0); emails with KN re: mediation (.2)	4.20
9/4/2008	Worked on supplemental briefing on class cert and MSJ (2.7); emails regarding mediation (.1)	2.80
9/8/2008	Worked on supplemental briefing on class cert and MSJ (3.2); emails regarding mediation (.2)	3.40
9/11/2008	Finalized and filed supplemental briefing on class cert and MSJ (1.9); emails regarding mediation (.2)	2.10
9/16/2008	Email with CBN regarding standard of review in 5th Circuit	0.10

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9/18/2008	Emails regarding rescheduling mediation	0.20
9/19/2008	Email re: rescheduling of mediation	0.10
9/23/2008	Email re: rescheduling of mediation	0.10
9/30/2008	Receipt and review of Defendants' supplemental responses and cross motion (2.0); emails and conferences re: same (.3)	2.30
10/1/2008	Continue review of defendants' filings (1.5); conference call re same (.3)	1.80
10/3/2008	Emails and conferences re: standard of review for court	0.50
10.6.08	Draft, revise and file motion for extension of time to file response/reply (1.3); emails re same (.2)	1.50
10.7.08	Worked on reply for motion for class cert (3.0); emails re: mediation (.1)	3.10
10.9.08	Continued to work on reply for motion for class cert	2.10
10.10.08	Finalized and filed reply	3.60
10/13/2008	Emails with WR re: KN letter (.2); legal research on bankruptcy issues (2.5)	2.70
10/14/2008	Conference call with co-counsel re: amending complaint (.5); worked on response to cross motion (2.7)	3.20
10/15/2008	Worked on reply and response to cross motion	2.10
10/16/2008	Worked on reply and response to cross motion	4.20
10/17/2008	Worked on reply and response to cross motion	4.10
10/20/2008	Finalized and filed motion to amend complaint (2.0); finalized and filed response/reply (1.2)	3.20
10/21/2008	Emails re: counterclaims and motion to amend	0.20
10/22/2008	Consideration of defs request to file counterclaim (.3); attention to preparing notebooks for the Court (3.0)	3.30
10/31/2008	Receipt and review of reply brief	0.60
11/10/2008	Emails and review of motion to amend	0.40
11/11/2008	Receipt and review of defendants withdrawal of opposition to motion	0.20
11/12/2008	Emails with Court Coordinator and submission of order	0.30
11/13/2008	Receipt and review of orders and calendaring	0.30
11/14/2008	Finalize and file 4th amended complaint	0.80
11/16/2008	Receipt and review of extended email from client	0.20
11/18/2008	Receipt and review of counterclaim; emails regarding conference call	0.50
11/19/2008	Receipt and review of court's order (.2); tc with co-counsel re court's order certifying class (.6); analysis and discussion of next steps in litigation (1.0)	1.80
11/23/2008	Receipt of multiple emails from client	0.40

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2009	11/24/2008	Emails with Nitin Sud re: depo scheduling (.2); multiple emails with clients and WR re: additional documents sent by Sterling (.5); review of documents (.4)	1.10
	12/1/2008	Emails with WR and Adam Reese re: invoices v; emails with NS re: depo scheduling and extension of time (.1); review of motion filed by Defs. (.3)	0.60
	12/3/2008	Emails with Sud re: depositions (.1); emails re: Reese (.1)	0.20
	12/5/2008	Receipt and review of defs amended answer	0.30
	12/8/2008	Email from Sud	0.10
	12/9/2008	Email with WR re: depositions	0.10
	12/10/2008	Emails with WR and Sud re: depos	0.20
	12/11/2008	Emails with WR re: depositions	0.10
	12/22/2008	Emails with clients (.1); receipt and review of client depositions (.1)	0.20
	1/7/2009	Emails with WR and client	0.10
	1/12/2009	Emails with WR re: depositions and experts	0.10
	1/14/2009	Emails with WR and client	0.10
	1/21/2009	Email with WR re: Reese	0.10
	1/26/2009	T/c with Walt re deposition of Cytec	0.75
	2/5/2009	Prepared depo outline for Walt for Cytec	2.50
	2/11/2009	Tc with Walt re deposition and necessary additional discovery to be conducted (.6); emails with WR re: documents from Van Rensalier deposition (.2)	0.80
	2/12/2009	Emails with WR re: Van Rensalier depo (.1); receipt and review of exhibits to deposition (.2)	0.30
	2/16/2009	Receipt and review of materials from Van Rensalier deposition	0.50
	3/6/2009	Receipt and review of Van Rensalier deposition (2.0); took notes on same (.3)	2.30
	3/9/2009	Emails with clients re: status	0.20
	3/10/2009	Emails with KN re: mediation	0.20
	3/19/2009	Working on discovery plan (1.1); emails with co-counsel and defendants counsel re: discovery items (.1); emails regarding scheduling of mediation (.1)	1.30
	3/20/2009	Emails re: mediation scheduling	0.20
	3/22/2009	Email from Evans	0.20
	3/24/2009	Emails with WR re: requirements for BOFD claims and multiple emails re: mediation	0.30
	3/27/2009	Multiple emails regarding setting up mediation	0.20
	3/28/2009	Review of email from Bob Evans re: mediation	0.10
	3/30/2009	Receipt and review of court order denying MSJs	0.40
	3/31/2009	Review of email from Sud re: mediation	0.10

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4/1/2009	Continued work with Walt on discovery matters (.2); emails with Sud regarding mediation and whether it would occur (.1); emails with Sud re: deposition dates (.1)	0.40
4/2/2009	Worked on letter with Walt to send to Defs re: discovery and depos	0.20
4/3/2009	Review of email from WR to client	0.10
4/4/2009	Review of email from Bob Evans re: status	0.10
4/6/2009	Review of materials from Sterling re: potential deponents (.2); email with client re: deponents (.1)	0.30
4/7/2009	T.c with WR re: depositions (.2); emails re: same (.1); extended email from Bob Evans (.2)	0.50
4/8/2009	Worked on setting up depositions (.2); t/c with WR (.2); emails with HG re: helping with depositions (.2); initial investigation of current status of certain deponents (.6).	1.20
4/9/2009	Multiple emails with defendants re: deposition scheduling (.1); emails with co-counsel re: depositions (.2); revise deposition notice of Elkins (.2)	0.40
4/10/2009	Emails with defendants re: depositions and emails with co-counsel re: depositions	0.20
4/13/2009	Multiple emails with defendants and co-counsel re: depositions and deposition topics for Hale	0.30
4/14/2009	Review of email from WR re: conversation with KN (.1); t/c with WR re: bifurcation (.3)	0.40
4/15/2009	Receipt and review of list of documents produced/outstanding	0.20
4/16/2009	Emails re: deposition scheduling and administrative issues	0.10
4/17/2009	Additional review of document index and related emails	0.20
4/20/2009	Legal research and review of memo re: BOFD (.7), emails re: same (.1)	0.80
4/22/2009	Travel to and from Dallas for meeting with co-counsel 7.5); prepared discovery plan for next 30 days (.6); emails re: witnesses and deposition notices (.2)	8.30
4/24/2009	Emails to and from Sud re: document and deposition matters	0.20
4/28/2009	Prepare for deposition of Vanderhoeven (2.0); prepare outline and review records (2.6); emails re: deposition scheduling (.2)	4.80
4/29/2009	Prepare for deposition of Vanderhoeven and took deposition	6.50
5/1/2009	Email from WR covering deposition matter and replied to same	0.20
5/4/2009	Prepare for deposition of Hale and prepare outline and review records (6.0); emails re: same (.2)	6.20
5/5/2009	Prepare for deposition of Hale and took deposition	8.40
5/6/2009	Emails regarding bifurcation (.2); emails with Sud re: extension (.2); review of outlines for Weatherford deposition (.4)	0.80

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5/7/2009	Emails re: McAlister deposition	0.20
5/8/2009	Multiple emails re: changing location of McAlister deposition	0.20
5/11/2009	T/c with co-counsel re: McAlister deposition (.3); prepared outline for McAlister deposition and emailed same to WR (1.0)	1.30
5/13/2009	Preparation for Crump deposition (1.2); reviewed documents and prepared outline (1.0); receipt and review of McAlister deposition (.9); receipt and review of motion to bifurcate (.5); receipt and review of Hale deposition (1,0)	4.60
5/14/2009	Preparation for deposition (1.0); travel to and from deposition (.5); took Crump deposition (5.0); conference with opposing counsel regarding mediation (1.0)	7.50
5/15/2009	Research and analysis of motion for class cert on breach of fiduciary duty claim (2.5); t/c with WR (.8); efforts to locate Diassi (.5); review of VanRensalier deposition (.4)	4.20
5/18/2009	Draft and revise motion to bifurcate (.4); legal research re: standard for Rule 42 motion (.8); emails with WR and Ntin re: motion (.2)	1.40
5/19/2009	Exchange emails with Nitin regarding depositions and motions (.2); receipt and review of revised bifurcation motion (.2)	0.40
5/20/2009	Worked on finalizing motion to bifurcate (1.1); receipt and review of Weatherford deposition (.8); receipt and review of BOFD research (.5); multiple emails re: extention of discovery deadlines (.2)	2.60
5/21/2009	Emails with Sud re: corporate rep depositions (.1); review of updated materials re: ERISA (.2)	0.30
5/22/2009	Email discussion re: BOFD standard (.3); emails with KN re: depo scheduling (.1); review of order on bifurcation (.2)	0.60
5/26/2009	Multiple emails re: BOFD matter (.1); emails with KN confirming extension of discovery deadline (.1)	0.20
6/1/2009	Emails with Sud re: Nieder depo scheduling	0.10
6/2/2009	Additional emails with Sud re: Nieder depo scheduling	0.10
6/3/2009	Prepared for and took deposition of Elkins (3.2); multiple emails re: discovery and BOFD claims (.2)	3.40
6/4/2009	Receipt and review of rough draft of Elkins deposition (.6)	0.60
6/5/2009	Receipt and review of BOFD memo (.5)	0.50
6/8/2009	Prepared email analysis of BOFD claims (.6)	0.60
6/10/2009	Receipt and review of documents (.4); receipt and review of updated expert report (.2); clarification emails re: scheduling and disclosure dates (.2); receipt and review of Vanderhoeven depo (.5)	1.30
6/11/2009	Receipt and review of McAlister deposition (1.2); emails with Sud re: testimony excerpts (.1)	1.30
6/12/2009	Review of multiple cases and secondary sources re: BOFD and BR actions (1.2)	1.20

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6/17/2009	Review of damage information for Harthun (.1); review of class cert case (.2); review of additional BOFD research (.4)	0.70
6/18/2009	Review of insert for BOFD class brief (.1); review of Elkins transcript (.2); prepared response to Delphi case (.8)	1.10
6/22/2009	Began editing WR's draft of BOFD class cert motion (3.4); emails with KN re: motion for extension of pages (.1)	4.40
6/24/2009	Worked on finalizing motion for cert (2.4); receipt and compilation of exhibits (.1)	2.50
6/25/2009	Drafted and filed motion for extension of page limits (.2); finalized and filed motion for class certification (2.3)	2.50
6/29/2009	Receipt and review of Motion for Partial Summary Judgment (.8); motion to strike experts (.2); emails re: same (.2)	1.20
6/30/2009	Receipt and review of order to file response	0.10
7/2/2009	Prepare for and took deposition of Nieder	9.20
7/8/2009	Travel to and from Dallas for meeting with co-counsel (5.2); prepared trial plan (.4); draft and revise response to motion to strike (.6); research on same (.4)	6.60
7/9/2009	Receipt and review of order denying motion to strike (.1); draft and revise letter to KN and obtained edits from cocounsel (.6); research re: BR claims (1.1)	1.80
7.14.09	Draft and revise response to motion for partial summary judgment	3.30
7.15.09	Draft and revise response to motion for partial summary judgment	4.40
7.16.09	Draft and revise response to motion for partial summary judgment	4.70
7.17.09	Draft and revise response to motion for partial summary judgment (4.5); receipt and review of letter to KN re: settlement (.4); receipt and review of edits and comments to response (.3)	5.20
7.20.09	Finalize and file reply to response to motion for cert on breach of fiduciary duty claims	1.20
7/22/2009	Emails with Sud and Court re: joint pretrial deadlines (.1); review of case file re: same (.3)	0.40
7.23.09	Review caselaw and draft of reply to response (.9); emails with Walt Roper (.1); t/c with Walt Roper (.1)	1.10
7/24/2009	Reviewed and finalized edits to reply to response to motion for cert on breach of fiduciary duty claims (3.5); receipt and review of def's reply brief (.7)	4.20
7/27/2009	Finalize and file reply to response to motion for cert on breach of fiduciary duty claims	3.80
7/28/2009	Worked on fee materials for supplementation of expert report	1.20
7/29/2009	Worked with expert on expert report on fees	1.90
8/5/2009	T/c with experts on supplemental reports (.5); research regarding materials to add for supplemental BR expert report (.9)	1.40

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8/6/2009	Continued work with experts on supplemental reports (.4); continued legal research regarding materials to add for supplemental BR expert report (.8)	1.20
8/7/2009	Receipt and review of final report	0.40
8/11/2009	Review of emails re: depositions	0.10
8/12/2009	Emails with CBN re: pretrial materials deadlines and review of court materials on same	0.30
8/13/2009	Emails with WR and Sud re: deadlines (.2); worked on Rule 11 agreement re: same (.7)	0.90
8/14/2009	Worked on deposition outlines and began outlining trial evidence (.7); review of additional documents (2.6); emails regarding supplementation (.2)	3.50
8/17/2009	Continued work on trial preparation and strategy; reviewed exhibits to depositions (2.4); emails and conferences re: AIG adjustor (.2)	2.60
8/21/2009	Receipt and review of additional court orders on MSJ and BOFD (1.2); emails and conferences re: same (.5)	1.70
8/24/2009	Receipt and review and editing of FOF/CL (2.6); emails regarding setting up conference call on case work (.2)	2.80
8/25/2009	Additional emails re: case status (.2); worked on FOF/CL (1.0); worked on pretrial materials (1.0); review of depositions and identification of sections for inclusion (.4)	2.60
8/26/2009	Continued work on pre-trial materials (2.2); depo summaries and FOC/CL and related filings (.9)	3.10
8/27/2009	Continued work on pre-trial materials (1.1); depo summaries and FOC/CL and related filings (2.6)	3.70
8/28/2009	T/C with HG and WR (.5); continued work on pretrial materials (1.2)	1.70
8/31/2009	Emails with clients re: settlement responses (.2); worked with Sara on exhibit list (.5); continued review of documents to determine if additional exhibits needed (1.2); t/c with KN (.2); worked with CBN on pre-trial order (1.7)	3.80
9/1/2009	Worked on Memo of Law (2.3); worked with CBN on pre-trial order and FF/CL (.9); worked on revising exhibit list and reviewed in documents on same (2.6)	5.80
9/2/2009	Continued projects on memo of law (.9); worked on pretrial order and ff/cl (3.5); worked on exhibit list (.2)	4.60
9/3/2009	Continued projects on memo of law (6.2); pretrial order (2.1); and ff/cl (2.7); and exhibit list (1.8)	12.80
9/4/2009	Finalized all pretrial materials (8.1); filed (.2); emails with co-counsel and defendants re: same (.2)	8.50
9/5/2009	Review of comments from clients regarding their comments on Def's pretrial materials	0.20

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9/7/2009	Review of Van Rensalier depo (2.0); emails with WR re: same (.2); receipt and review of response to settlement proposal (.2)	2.40
9/8/2009	Conference call with HG and WR (.75); worked on timeline (2.0); worked on exhibit production for Defendants (.7); prepared for trial (2.7)	6.15
9/9/2009	Worked on preparation for trial (3.2); emails with consultant re: Sterling financial position (.7); worked with clients on counter-offer (.4); worked with Defendants on scheduling letter to court (.3)	4.60
9/10/2009	Multiple t/c with co-counsel re: HG injury and need for continuance (.8); emails and t/c with Def's re: same (.5); draft and revise motion for continuance and affidavit and filed same (3.2); worked on depo designations to revise same (1.0)	5.50
9/11/2009	Email with Def. and experts and clients re: dates for testimony and travel arrangements (.2); correction of depo excerpts (.5); prepared objections to defendants' exhibits and reviewed their objections to Plaintiffs' exhibits (4.4)	5.10
9/12/2009	Reviewed timeline and made edits	0.80
9/14/2009	Worked with Nitin Sud on the parties' objections to exhibits (2.5); multiple emails with court, defs and witnesses re: moving trial date to later in the month (.9)	3.40
9/16/2009	Continued work on scheduling witnesses; conferences with counsel, court and defendants; continued work on trial prep; preparation of outlines	2.40
9/17/2009	Continued work on scheduling witnesses; conferences with counsel, court and defendants; worked on witness outlines	1.70
9/18/2009	Continued work on rescheduling trial	0.30
9/28/2009	Emails and conferences re: rescheduling of trial; t/c with experts,	1.20
9/29/2009	Emails and conferences finalizing the rescheduling of trial	0.30
9/30/2009	Emails to co-counsel, clients, experts re: rescheduling	0.40
10/1/2009	Emails to co-counsel, clients, experts re: rescheduling	0.20
10/27/2009	Travel to Dallas and back (3.0); meeting with HG and WR (2.0); preparation of trial materials (1.3)	6.30
10/29/2009	Emails with co-counsel re: BOFD remedies	0.20
11/12/2009	Worked on preparing exhibits for trial (1.8); emails with co-counsel re: trial prep (.1)	1.90
11/2/2009	Emails with expert	0.20
11/3/2009	Prepared pretrial materials and various filings	6.20
11/4/2009	Prepared pretrial materials and various filings	5.30
11/5/2009	Worked on pretrial materials and prepared for trial	11.50

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2010	11/6/2009	Worked on compiling and revising exhibit list for filing (2.1); drafted and revised responses to Defendants' objections to trial exhibits (3.5); reviewed documents and deposition testimony in preparation for trial (4.9)	10.50
	11/7/2009	Preparation for trial (2.1); reviewed depositions (2.2); created witness outlines (1.0)	5.30
	11/8/2009	Continued preparation for trial, including review of depositions (4.2); created witness outlines (2.3); reviewed expert reports and exhibits (3.0)	9.50
	11/9/2009	Continued preparation for trial by reviewing depositions (3.2); created witness outlines (4.5); reviewed expert reports and exhibits (3.5)	11.20
	11/10/2009	Participated in first day of trial (10.5); meetings with clients and co-counsel and preparation for day 2 (2.5)	12.50
	11/12/2009	Participated in second day of trial (10.0); meetings with clients and co-counsel and preparation for day 3 (1.7)	11.70
	11/13/2009	Participated in third day of trial (5.0); meetings with clients and co-counsel after trial (2.0); receipt and review of Defendants' motion for judgment on partial findings (1.8)	8.80
	11/16/2009	Post-trial conferences and emails with co-counsel regarding crafting argument for post-trial briefing (1.0); additional legal research regarding cases cited by Def expert (1.0); receipt and review of multiple orders and minute entries (.3)	2.30
	11/17/2009	Multiple emails crafting argument for post-trial briefings (.6); emails with Steege re: additional opinions (.4); additional legal research (.7)	1.70
	11/20/2009	Emails with Sud and co-counsel re: ordering transcript	0.30
	11/23/2009	Additional emails with Sud and co-counsel re: ordering transcript and calculating deadlines for briefing	0.20
	12/1/2009	Emails with Russell Post regarding getting involved in post-trial briefing (.2); additional emails regarding timing of briefing (.2)	0.40
	12/2/2009	Emails regarding post-trial briefing (.2); additional research on 11 USC 1114 (1.0)	1.20
	12/3/2009	Draft and revise response to motion for judgment (3.2); attention to filing same (.2)	3.40
	12/7/2009	Emails with Russell Post and WR re: briefing	0.10
	12/8/2009	Emails with WR re: elements to be briefed in post-trial briefing	0.10
	12/11/2009	Emails with Sud re: transcript	0.10
	12/16/2009	Additional emails with Sud re: transcript	0.10
	12/21/2009	Discussions with RP re: BRS involvement	0.10
	12/23/2009	Additional emails with RP re: BRS involvement (.1); email from client (.1)	0.20
	1/5/2010	Emails with NS re: transcript	0.10
	1/6/2010	Emails with HK re: transcript and deadlines	0.10

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1/13/2010	Emails with HK and WR re: BRS proposal	0.20
1/14/2010	Emails with clients re: status	0.10
1/16/2010	Emails with WR and RP re: agreement	0.20
1/18/2010	Emails with WR re: co-counsel agreement and with KN and NS re: transcript	0.20
1/19/2010	Emails with RP and WR re: changes to co-counsel agreement and edited same	0.40
1/20/2010	T/c with RP (.2); emails with NS re: deadlines (.2); receipt and review of transcript (.8)	1.20
1/21/2010	Receipt and review of notice of appearance (.1); emails re: finalizing agreement (.1); emails re: transcript (.1)	0.30
1/22/2010	Receipt of additional section of transcript and review	0.10
1/25/2010	Emails with NS re: transcript	0.10
1/27/2010	Review of RP outline of post-trial brief (.2); edits and comments to same (.1)	0.30
1/29/2010	Emails with RP re: outline; additional emails regarding finalizing agreement	0.20
2/4/2010	Emails with clients and setting up call	0.10
2/9/2010	Review of transcripts in preparation for conference call re: brief (1.0); conference call (.2)	1.20
2/17/2010	Emails with RP re: deadlines and extension of same	0.20
2/18/2010	Receipt of draft brief (.2); legal research regarding definition of "payments" (2.2); t/c with RP re: comments (.2); emails re: comments (.1)	2.70
2/19/2010	Continued work and research on post-trial brief (3.5); worked with Chad Flores on citations (.7)	4.10
2/23/2010	Review and revisions to draft of post-trial brief (3.0); emails re: same (.2)	3.20
2/24/2010	Additional review and revisions to draft of post-trial brief (1.1); emails re: same (.1)	1.20
2/25/2010	Receipt and review of Defendants' briefing	0.40
3/2/2010	Review of outline of reply (.2); administrative matters re: experts (.2)	0.40
3/4/2010	Worked with CF on exhibits for brief	0.20
3/5/2010	Reviewed reply brief and edited same	1.40
3/8/2010	Receipt and review of Defendants' post-trial brief and emails and t/c re: same (1.5); review and revise reply brief and emails re: same (.8)	2.30
4/12/2010	Receipt and review of emails regarding Defendant supplement of additional authority	0.30
4/13/2010	Additional emails re: supplement	0.20
4/14/2010	Review of response to supplement	0.10
7/1/2010	Receipt and review of opinion (.8); t/c re: same with WR (.3)	1.10

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2011	7/2/2010	T/c with WR and HG re: opinion (1.0); emails with clients and counsel (.1)	1.10
	7/6/2010	Conference with RP, CF and WR (.3); legal research re: clients' exposure for fees (1.0)	1.30
	7/14/2010	Emails and discussion re: notice of appeal	0.20
	7/16/2010	T/c re: notice of appeal and bill of costs (.3); receipt and review of notice of appeal and motion for costs (.1)	0.40
	7/19/2010	Review and analysis of Visteon case (.6); emails re: same (.1)	0.70
	8/10/2010	T/c with Kelly Edwards re: settlement proposal (.5); conveyed same to group (.5); emails and conferences re: same (.6)	1.60
	8/11/2010	Emails with KN re: settlement	0.20
	8/20/2010	Emails with Steege re: opinion and assistance on appeal	0.20
	10/21/2010	Emails with CF re: extension of deadlines (.2); review of motion (.4)	0.60
	11/9/2010	Email from client re: status	0.10
	11/10/2010	Emails to/from client re: status	0.10
	11/11/2010	Emails re: administrative appellate filings	0.20
	11/16/2010	Receipt and initial review of draft brief (1.1); sent edits to RP (.1)	1.20
	11/18/2010	Receipt and review of revised brief (.7); edits to same sent to RP (.2)	0.90
	11/19/2010	Receipt and review of latest draft (1.2); sent comments and edits (.2)	1.40
	12/14/2010	Receipt and review of motion and order on extension (.1); calendaring of deadlines (.1)	0.20
	1/21/2011	Receipt and review of Appellee's brief (1.1); review of documents and cases raised in same (.5)	1.60
	1/31/2011	Emails with RP re: brief and extension for reply	0.30
	2/1/2011	Review of order on extension and calendaring	0.10
	2/10/2011	Email with expert witness regarding additional assistance on appeal	0.10
	2/18/2011	Receipt and review of appellant's reply brief (1.1); edits and comments to same (.2)	1.30
	2/21/2011	Review of final version of reply brief	0.60
	6/9/2011	Review of multiple emails to/from clients re: status (.2); emails with RP re: calendaring of events and oral hearing (.1)	0.30
	6/10/2011	Emails to/from RP re: financial reports from Sterling	0.20
	7/29/2011	Emails to/from RP re: Cigna and analysis thereof (.2); reviewed Cigna (.5)	0.70

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8/8/2011	Review of letter to 5th Cir re: Cigna (.2); emails with RP re: same (.1)	0.30
8/10/2011	Emails with WR re: attending oral hearing.	0.20
8/11/2011	Emails with client re: questions re: appellate matters	0.20
8/29/2011	Emails re: appellate panel and related hearing matters	0.30
8/30/2011	Emails with RP re: hearing (.1); review of letter filed by Sterling (.2); emails with CF re: questions in preparation for hearing (.2)	0.50
9/1/2011	Listened to oral argument and emails re: same	0.80
9/21/2011	Emails with client re: questions posed post appeals	0.20
10/13/2011	Receipt and review of opinions (2.0); multiple emails and t/c with co-counsel (.4)	2.40
10/14/2011	Multiple emails with co-counsel re: decision	0.40
10/18/2011	Conference calls with co-counsel (.3); review of Eastman/Sterling merger documents (.5)	0.80
10/19/2011	Emails regarding conference call and 5th Cir. Decision	0.30
10/20/2011	Conference and emails re: settlement (.5); review of damage information and attention to updating same (1.2)	1.70
10/26/2011	Emails with WR analyzing next steps; review of prior orders and analysis	0.70
10/27/2011	Receipt and review of reconsideration petition (.7); email and discussion with RP re: same (.1)	0.80
10/31/2011	Multiple emails with co-counsel re: settlement discussions and review of HG/KN conference	0.40
11/2/2011	Emails with CF re: gathering time records	0.20
11/3/2011	Analysis of lodestar and damage analysis (.2); reviewed spreadsheets and damages (.7)	0.90
11/4/2011	Continued review of damage information	2.30
11/7/2011	Email to KN	0.10
11/14/2011	Receipt and review of order denying petition for rehearing (.4); emails and conferences re: same (.2)	0.60
11/16/2011	Continued work on damage spreadsheet; t/c with KN re: Eastman plans and settlement processes; review of information provided by Eastman in regard to proposals	1.90
11/17/2011	Continued work and analysis of damages and plan documents	3.10

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11/18/2011	Continued work and analysis of damages and plan documents (2.5); prepared extended analysis for co-counsel (.5); emails with expert re: analysis (.2); emails with co-counsel re: negotiation (.3); extended email to KN (.2)	3.70
11/20/2011	Review of email from expert	0.10
11/21/2011	Emails with Notestine re: materials, expert review, and insurance change issues (.2); emails with expert regarding scope of work and materials to be reviewed (.2)	0.40
11/22/2011	Worked with expert on engagement letter and conferences re: same (.3); review of mandate notices (.1); emails with WR re: setting up conference call (.2)	0.60
11/28/2011	Draft and revise settlement demand (1.1); t/c with Walt Roper(.5); draft and revise call notes to clients(.2); review of damage figures(.2); draft and revise letter to Court responding to Notestine letter to Court (.6)	2.60
11/29/2011	Draft and revise settlement demand (2.2); t/c with Walt Roper (.3); review of damage figures (.2)	2.70
11/30/2011	Worked extensivley on compiling class lists and evalauting damage claims (3.1); numerous emails with co-counsel re: same (.2); emails with client re: changes in insurance (.1)	3.40
12/1/2011	Continued work on compiling class lists and evalauting damage claims (1.7); numerous emails with co-counsel re: same (.2); additional emails with client re: changes in insurance (.2)	2.10
12/2/2011	Worked on damage issues for class members (.4); multiple emails re: same (.2)	0.60
12/3/2011	Receipt and review of Newberg article on hybrid class actions	0.30
12/4/2011	Receipt and review of extended email from client	0.20
12/5/2011	Emails with expert re: report (.2); emails with co-counsel and clients regarding Eastman letters (.1)	0.30
12/6/2011	Emails regarding class member damages	0.30
12/7/2011	Emails and conferences with expert on valuation (.5); review of valuation data (1.2); emails with clients regarding additional concerns with changes in Eastman plans (.3); t/c with KN and emails to KN about insurance issues (.3)	2.30
12/8/2011	Emails and telephone conferences with expert on insurance valuation (1.1); emails with clients regarding Eastman actions and changed in plans (.3)	1.30
12/9/2011	Multple emails regarding Defendants' proposed motion for stay (.2); emails with clients (.2); review of Defendants' motion (.8); drafted initial response to the motion and circulated for comments (2.5)	3.70

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2012	12/10/2011	Review of cases and discussion regarding approach to response to motion for stay	0.40
	12/12/2011	Review of proposed response to motion to stay (.6); worked on attachments to same (.8); multiple emails regarding drafts and filing (.2)	1.60
	12/13/2011	Conference call with Court (.3); emails re: same (.2); investigation of class members and claims (.3)	0.80
	12/14/2011	Followup emails to court conference call (.2); review of court orders and proposed order (.2)	0.40
	12/15/2011	Receipt and review of court order on discovery (.2); receipt and review of expert report on change in insurance plans (1.2); receipt and review of client damages (2.5); t/c with expert (.4)	4.30
	12/16/2011	Emails with KN re: insurance issues raised by Eastman changes (.2); receipt and review of Sterling letter to court (.2); reviewed Sterling response on discovery motions (.4); worked on damage models and gathering information from clients (1.8)	2.60
	12/19/2011	Emails with clients re: insurance questions (.3); attention to expert questions and evaluation of plan documents (2.7); t/c with clients re: expert report (.4)	3.40
	12/20/2011	Draft and revise settlement demand (1.5); multiple emails re: same (.4); worked on damage figures and supporting spreadsheets (1.2)	3.10
	12/21/2011	Emails with clients regarding telephone conference and settlement proposal	0.80
	12/24/2011	Receipt and review of settlement letter and proposal (.2); research on damages (.1)	0.30
	12/28/2011	Emails regarding locating class members	0.20
	12/30/2011	Emails with KN re: extension of discovery	0.20
	1/2/2012	Emails re: payment to experts	0.10
	1/3/2012	Emails regarding discovery requests and damage spreadsheet (.2); email from HG re: t/c.with KN (.1)	0.30
	1/5/2012	Receipt and review of response letter from KN re: settlement proposal (.5); legal research regarding damage issues cited in letter (1.1); email with co-counsel re: same (.2)	1.80
	1/6/2012	Additional emails regarding damages issues and KN settlement response	0.40
	1/13/2012	Emails regarding Sterling discovery responses and setting up mediation (.3); email to KN re: responses and need for additional information before mediation (.4)	0.70
	1/16/2012	Emails regarding locating class members	0.10

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1/17/2012	Emails re: conference call and Sterling defensive matters	0.20
1/18/2012	Email to KN re: mediation and suggesting mediator (.2); t/c with WR re: same (.1)	0.30
1/20/2012	Extended conference call with WR and RP re: litigation strategy and matters to be briefed pending potential mediation and pet for writ (.7); reviewed plan documents re: \$50K cap (.2); receipt and review of supplemental discovery responses (.5)	1.40
1/24/2012	Receipt and review of Eastman article (.2); receipt and review of Sterling's Supp. Response to discovery and reviewed Ex. B (.6); compared to prior figures (.6)	1.40
1/27/2012	Continued damage analysis using spreadsheets and supplemental discovery responses	1.10
1/30/2012	Emails regarding potential class members and discovery requests regarding same (.1); updates of damage calculations (.1); t/c with SM re: spreadsheets on damages (.4)	0.60
1/31/2012	Emails re: discussion of mediators (.2); emails with RP re: waiver letter in regard to Sterling petition for cert. (.4)	0.60
2/1/2012	Review of email from KN re: mediator	0.10
2/7/2012	Multiple emails and conference calls regarding scheduling of mediation and selection of mediator (.3); receipt and review of supplemental discovery responses and analysis of damage calculations and comparison to prior spreadsheets (2.2)	2.50
2/8/2012	Multiple emails and conference calls regarding scheduling of mediation and selection of mediator	1.20
2/9/2012	Conference call with WR and additional legal research (.2); emails re: discovery (.2); emails re: special master issues (.2); receipt and review of draft of temporary injunction motion (.8); review of class certification decisions following the Wal-Mart opinion (2.4)	3.80
2/10/2012	Attention to mediation matters (1.2); emails regarding discovery and client contracts (.6)	1.80
2/13/2012	Multiple emails re: petition for cert. (.2); reviewed petition for cert (1.0); t/c with KN re: settlement conference and scheduling of same (.2); reviewed discovery and damage calculations (1.8)	3.20
2/14/2012	Emails re: scheduling of meeting and mediation; worked on damage calculations; worked on letters to clients re: discovery; reviewed damage cases and research re: same	4.60
2/15/2012	Prepared materials for mediation (2.1); compiled exhibits for mediation (1.9); meeting with KN and SM at Littler regarding damage issues and settlement issues (2.0); reviewed special master motion (.5); multiple emails regarding same (.3)	6.80

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2/17/2012	Receipt and review of BRS fees and expenses for evaluation	0.10
2/16/2012	Emails regarding meeting with KN (.2); reviewed revised damages figures (2.1); prepared materials for mediation (1.2); emails regarding letters to clients (.1)	3.60
2/17/2012	Review of cases regarding damages that are recoverable (.8); conference call with counsel and clients in preparation for mediation (.4); emails re: damage issues and logistics for mediation (.2)	1.40
2/20/2012	Travel to and from Dallas (3.0); attend mediation (12.0)	15.00
2/21/2012	Emails to and from clients re: mediation (.2); worked on settlement structure (2.0); emails setting up continuation of settlement talks (.3)	2.50
2/22/2012	Continued work on settlement structures (1.5); emails with co-counsel re: same (.2)	1.70
2/23/2012	Receipt and review of HG time and expenses	0.10
2/24/2012	Receipt and review of HG edits to settlement proposal (.2); receipt and review of edited time (.2); draft and revise settlement agreement (.3)	0.70
2/27/2012	Worked on administrative appeal re: \$50K issue (.4); drafted and revised documents (.5); obtained documents from clients (.2); multiple emails re: settlement proposal (.2)	1.30
2/28/2012	Multiple emails re: administrative appeal (.2); multiple emails re: compiling information to supplement mediation efforts (.2); continued review and compilation of appeal documents (.7)	1.10
2/29/2012	Review of time records in advance of disclosure (.3); multiple emails re: compiling data to disclose to defendants on time and expenses (.3); finalize draft of settlement agreement and forward to WR for review (.6); emails re: continuance on discovery responses (.2); legal research re: settlement options (.4); worked on damage worksheet for class members to estimate total damages (.6)	2.40
3/1/2012	Emails with Rust obtaining project estimate (.2); emails and evaluation of settlement proposal and estimation of damages (.3); emails with Ira Goldman (.2)	0.70
3/2/2012	Compiled materials to be disclosed to defendants re: continuing mediation efforts (1.2); compiled extended cover email (.3); finalized settlement proposal (.7)	2.20
3/5/2012	Evaluation of correspondence re: Supreme Court amicus (.4); emails with co-counsel and clients (.1); t/c with RP (.2); t/c with WR (.1)	0.80

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3/6/2012	Further evaluation of settlement agreement and emails re: same (.3); extended t/c with defendants and mediator (1.0); revised settlement demand consistent with continued discussions (2.0); circulated same and evaluation of comments to same (.2); multiple emails with clients and extended discussion re: same (1.1)	4.60
3/7/2012	Review and analysis of Supreme Court opinion	0.30
3/12/2012	Receipt and review of defendants' counter proposal (.2); t/c with WR re: same (.2); emails with counsel and clients re: same (.2)	0.80
3/13/2012	Discussions and emails re: settlement status and withdrawn offer (.2); reviewed amicus brief (.4); emails re: analysis of amicus supreme court brief (.1)	0.70
3/14/2012	Receipt and review of new settlement proposal (.2); discussions and emails re: new settlement proposal (.1)	0.30
3/17/2012	Emails re: Supreme Court status	0.10
3/19/2012	Multiple emails re: Supreme Court decision and analysis of next steps	0.40
3/20/2012	Prepared analysis of offers and counters (.4); t/c with mediator, WR, and HG (.5)	0.90
3/21/2012	Multiple emails re: revising settlement proposal (.2); edited settlement proposal (1.8); drafted and revised materials for appeal of \$50K cap (2.2); multiple emails re: damages expert and retention of new expert (.2); review of damages spreadsheet from WR (.4); analysis of motion for court-appointed expert (.4); receipt and review and editing of draft discovery responses (.2); t/c with WR re: same (.3)	5.70
3/22/2012	Continued to edit appeal letter (1.0); circulated for comments and emails re: same (.3); emails re: discovery (.2); emails with Hamilton to obtain signature (.3)	1.80
3/23/2012	Finalized and served appeal letter (1.0); emails with clients and class members re: appeal (.2)	1.20
3/26/2012	Emails with WR re: special master candidates (.1); t/c with WR re: same (.3); emails with clients re: appeal of \$50K cap (.2)	0.60
3/27/2012	Emails re: special master	0.20
3/28/2012	Emails re: discovery to be completed before deadline (.1); receipt, review revise updated draft of TI motion (.7)	0.80
3/29/2012	Extended t/c with expert Reese (1.0); gathered information from clients re: current premium levels (.4)	1.40
4/3/2012	Review and edit motion for special master (.3); filed same (.2); review of damage spreadsheet and emails re: same (.4); t/c with SM re: damage calculation (.3)	1.20
4/4/2012	Emails with KN re: damages information and injunction motion (.2); emails re: class member damages (.1)	0.30
4/5/2012	Extended t/c with KN re: damages and possible resolution (.4); review notes re: class member damages (.2)	0.60

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4/9/2012	Multiple emails re: scheduling (.2); emails re; revision to TI motion (.1); drafted and revised motion (1.0); drafted declaration of Bob Evans in support of motion (.4); receipt and review of letter response to \$50K appeal issue (.2); drafted RMW declaration in support of TI motion (.5)	2.40
4/10/2012	Emails with WR and KN re: deposition dates for corporate representatives (.2); finalize and forward declaration for Evans (.3); receipt and review of draft of TI motion and order (.6)	1.10
4/12/2012	Emails re: deposition of corp. rep. (.3); receipt and review of declaration for motion (.2); receipt and review of CVs for special masters (.2); finalized motion and declarations for TI (.6); emails re: TI motion (.2)	1.50
4/13/2012	Finalized TI motion and filed (.3); review of list of persons who did not qualify as class members (.2); receipt and review of response to motion for special master (.2); receipt and review of MSJ (.4)	1.10
4/16/2012	T/c with WR and RP re: damages issues and legal research re: same (.2); draft and revise cover letter to class members re: damage information (.4); emails re: mediation efforts (.2)	0.80
4/17/2012	Damages analysis of certain clients (.3); emails with HG re: mediation efforts (.2); emails with WR re: special master (.2)	0.70
4/18/2012	Prepared corporate rep deposition topics and notice (.5); emails re: same (.2); multiple emails with WR and SS re: class member damage questions (.2); analysis of damage issues and legal research re: same (1.2)	2.10
4/20/2012	Receipt and review of supplemental disclosures (.3); evaluation of Roulhac damages (.5); receipt and review of order appointing special master (.1)	0.90
4/23/2012	Evaluation of Moulton and determination of whether he was a member of the class (.5); receipt and review of motion of partial summary judgment (.4); multiple emails and evaluation of same (.2)	1.10
4/24/2012	Emails with clients re: Sterling filings (.2); receipt and review of additional damage information forwarded to Reese (.3); continued evaluation and analysis of Sterling filings (1.2)	1.70
4/25/2012	Receipt and review of materials regarding Hamilton appeal (.6); multiple emails and t/c re: special master issues (.4); receipt and review of modified exhibit on overcharges (1.1)	2.10
4/26/2012	Prepared for and took deposition of corporate representative of Eastman (8.1); t/c with WR (.4); emails regarding evaluation of special master order and motion (.3)	8.80

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4/27/2012	Review and editing of quotes from Belcher deposition to use in response to prelim injunction response; receipt and review of defendants' response to appeal of \$50K cap issue; receipt and review of materials re: special master; draft and revise special master order; drafted extended email to clients; draft and revise reply in support of motion for prelim injunction; review of additional damage information from clients;	3.20
4/30/2012	Emails with clients re: status (.1); updated costs and expenses (.2); review of updated information re: client damages (.4); draft and file agreed motion for extension of time to supplement expert reports (.9); draft and revise supplemental response to disclosures (1.5); draft and revise settlement proposal (1.2); multiple emails re: expert issues (.2); review of RP draft reply (.2); review of draft expert report from Reese (.5); receipt and review of defendants' 7th suppl. disclosures (.4)	5.60
5/1/2012	Emails with co-counsel re: mediator involvement and emails to same (.2); emails with RP re: additional MSJ briefing and analysis (.2)	0.40
5/2/2012	Receipt and review of court order (ECF 209) (.2); emails and t/c with co-counsel re: same (.3); emails with mediator re: latest order (.2); receipt and review of draft expert report (1.0); emails re: same (.1)	1.80
5/3/2012	Emails with co-counsel re: next steps (.2); edited expert report and sent changes to same (.3); receipt and review of draft motion to appoint special master (.2); edited same and circulated (.2); review of additonal edits from co-counsel (.2); review of email to mediator (.1)	1.20
5/4/2012	Emails with expert re: damage report and reviewed damage data (.2); emails re: options for settlement terms; receipt and review of Sterling reply briefs (1.0); emails discussing same with RP (.2); receipt and review of prelim injunction order (ECF 213) (.2)	1.60
5/6/2012	Review of email from Reese to WR (.1); review of updated draft report (.7)	0.80
5/7/2012	Emails with WR and SS re: damage chart, expert report, and Ex. C (.4); email with HG re: mediation efforts (.2); emails with KN and WR re: court correspondence and mediators (.2); emails with Reese re: damage report (.2); receipt and review of amended reponse (1.2); emails and t/c with WR re: issues with report (.1); multiple emails with WR re: getting report served (.2); service of report (.1)	2.60

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5/8/2012	Emails with SM re: designation of additional counsel (.3); extended t/c with KN re: special master issues (.2); extended email to co-counsel re:same (.2); receipt and review of extended email from KN to the Court re: special master issues (.3); emails with HK re: mediation efforts (.2); emails with RP re: response to KN email to Court (.3)	1.50
5/9/2012	Emails with KN and the Court re: expert issue (.5); emails with co-counsel and court responding to KN email on SM and request for status conference (.6); receipt and review of order appointing SM (.2)	1.30
5/10/2012	Receipt and review of email from KN (.2); conference call with mediator and parties (1.0); began work on a revised demand (.5); receipt and review of email from Clerk and emails with KN and co-counsel re: same (.2)	1.90
5/11/2012	Compiled revised demand for review (1.5); emails with co-counsel re: same (.2); emails with KN re: expert designation issue (.2); t/c with co-counsel re: expert issue (.3); draft and revise settlement MOU (1.2); multiple emails with co-counsel re: expert issue (.2); receipt and review of WR email to SM and t/c with WR re: same (.1); receipt and review of corp. rep deposition (.1); email to KN re: expert issues (.2); legal research re: late designation and late supplementation (.2); draft and revise motion for clarification and email exchanges with co-counsel re: same (1.4); t/c with RP re: motion and review of edits (.5); receipt and initial view of reply to MSJ (.7)	6.80
5/12/2012	Receipt and review of WR edits and comments to reply brief	0.20
5/14/2012	Reviewed draft reply to MSJ (.3); reviewed deposition testimony (.5); t/c with CF and forwarded comments and additions to brief (.2); multiple emails with co-counsel (.2); emails with SM (.2); emails with defendants (.1); continued review of damage figures provided by Reese (2.5); draft and revise MOU and new settlement demand (.5); forwarded same to Defendants (.2); draft and revise declaration in support of reply to MSJ and compiled exhibits to same (.5)	5.20
5/15/2012	Emails with SM and co-counsel re: call with SM	0.70
5/16/2012	T/c with KN in advance of call with SM (.1); email to SM (.1); call with SM (.2); call and emails with co-counsel (.3); coordinated with Defendants on information to send to SM (.5); coordinated with Sara Stevens on information for SM (.6)	1.80

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5/17/2012	Continued review of counteroffer (.2); multiple t/c and emails with co-counsel (.3); legal research and review of cases to respond to defendant's position (1.5); draft and revise response to counter (1.5); draft and revise legal arguments in response (.5); t/c with Sara Stevens re: items to send to SM (.3); reviewed correspondence with SM (.2); compiled correspondence and response to defendant and forwarded same (.3)	4.80
5/18/2012	Emails with WR and HG re: settlement terms	0.20
5/21/2012	Emails with WR re: settlement (.2); t/c with WR (.2); review of damage figures and recalculation of potential damages (.5); email with Reese re: costs of report (.2)	1.10
5/22/2012	Receipt and review of correspondence from Defendants to SM (.5); emails with co-counsel re: SM and settlement issues (.2); t/c with co-counsel re: settlement issues (.2); emails with clients setting up call (.2); t.c with RP (.1).	1.20
5/23/2012	T/c with clients re: settlement status and demand (.5); emails with clients and co-counsel re: settlement (.2); multiple emails and t/c with WR and HK regarding settlement terms (.5); draft and revise terms of MOU (1.0); receipt and review of Court order on clarification (.1).	2.30
5/24/2012	Multiple t/c with WR and HG re: settlement (.5); draft and revise terms of MOU (1.2); multiple emails with counsel and clients (.2); emails from KN re: settlement (.2); email from Special Master (.2)	2.30
5/25/2012	T/c with WR and emails with counsel re: expenses and Reese bill	0.20
5/29/2012	Emails with WR re: accountants and expenses (.1); emails with HK re: MOU status (.2); emails with WR re: class action settlement analysis after liability holding (.2); review of cases (.4)	0.90
5/30/2012	Emails re: certification standard and settlement standard	0.10
5/31/2012	Emails with WR and SS on expense reconciliation (.2); receipt and review of defendants' mark-ups to MOU and began review of same (.6)	0.80
6/1/2012	Continued review and editing of defendants' MOU mark-up (1.0); emails and calls with co-counsel re: comments (.3); t/c with KN re: matters of particular concern in MOU (.5)	1.80
6/4/2012	Continued editing MOU (.5); continued work on damage chart for Ex. C (.5); t/c with WR re: amending class definition (.1); receipt and review of legal research re: propriety of modifying class definition after liability finding (.3)	1.40
6/5/2012	T/c with WR and RP re: amending class definition (.3); edited MOU (1.1); circulated same for comment (.1); edited based on comments (.5); circulated to Defendants (.1)	2.10
6/6/2012	Worked on exhibits to MOU	1.30

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6/8/2012	Emails with KN re: MOU issues and terms to be clarified (.2); review of MOU attachments (.3)	0.50
6/11/2012	Receipt and review of revised MOU from defendants (.5); circulated same for comments (.2); emails with clients re: approval to same (.3); extended email with Evans re: settlement terms (.7)	1.70
6/12/2012	T/c with SM (.1); additional edits to MOU (.5); circulated for execution and obtained same (.2)	0.80
6/13/2012	Circulated executed version of MOU with explanatory note to defendants	0.20
6/15/2012	Additional emails and t/c with KN re: additional changes in MOU	0.50
6/16/2012	Emails with KN re: status	0.10
6/18/2012	Receipt and review of additional changes to MOU (.6); t/c with KN re: same (.3); edited MOU (.2); emails with WR re: how to address MOU changes (.2)	1.30
6/19/2012	Emails with KN re: conference call to discuss MOU and attention to scheduling call	0.20
6/20/2012	T/c with KN and Phil Belcher re: final modifications to MOU (.3); edited MOU (1.0); circulated modifications for approval (.1); requested and received final version of Ex. C from defendants (.1)	1.50
6/21/2012	Circulated revised executed MOU (.1); emails with WR re: forwarding to clients (.1)	0.20
6/25/2012	Emails with WR re: scheduling (.2); began drafting settlement agreement (3.3)	3.50
6/26/2012	Drafted and revised settlement agreement	4.20
6/27/2008	Drafted and revised settlement agreement (2.5); circulated draft to defendants and co-counsel (.1); began drafting order for preliminary approval (1.9)	4.50
6/28/2012	Email to KN re: conference call (.1); finalized draft of preliminary approval order and circulated same (1.5); email to Rust regarding project and soliciting bid (.2)	1.80
6/29/2012	Emails with Rust re: project scope	0.20
7/2/2012	Receipt and review of order of dismissal and emails re: same (.2); worked on settlement agreement and notice and claim form (1.4)	1.60
7/3/2012	Edits settlement agreement (.4); emails with WR and HK re: status of projects (.2); emails with KN re: email to send to Court clerk (.3); sent email to Court clerk (.1)	1.00
7/4/2012	Review of WR email with draft of motion for prelim app (.4); email with MB (.1)	0.40

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7/5/2012	Edited and revised settlement agreement (.4); edited and revised draft of prelim. approval order (.2); drafted and revised class notice (.2); emails to circulate same (.1); reviewed draft of motion for prelim. approval and edited same (.2)	2.10
7/6/2012	Draft and revise claim form and circulate for discussion (1.2); emails re: same (.1)	1.30
7/9/2012	Draft and revise settlement agreement (2.2); emails with KN re: conference call and court issues (.2)	2.40
7/10/2012	Draft and revise order on prelim approval after receipt of WR edits (.7); draft and revise class notice after receipt of WR edits (.5); draft and revise motion for prelim app after receipt of RP edits (.3); draft and revise claim form after receipt of WR edits (.5); extended t/c with KN re: timing and alterations to settlement (.3); extended email to co-counsel re: discussion with KN and making recommendations for action (.3); emails with Court clerk re: calendar issues (.4); draft and revise motion to reinstate and circulated same (1.5); receipt and review of edits to same and made changes (.5); receipt of additional changes to motion for prelim. app. (.4); receipt and review of defendants' written changes to settlement (.5); emails re: same (.3); pulled together citation list for motion to amend (.2); emails with KN re: motion to reinstate (.2)	6.60
7/11/2012	Finalized and filed motion to reinstate (1.5); worked on declaration (.5); worked on revising settlement agreement (.6); worked on motion for preliminary approval (1.0)	3.60
7/12/2012	Emails with SS re: question from class member (.3); edited settlement agreement and circulated new draft (1.5); reviewed and edits motion to amend and reviewed emails re: same (1.0); drafted and revised declaration in support of prelim app and circulated same (2.0)	4.80
7/13/2012	Draft and revise settlement (.5); emails re: same (.2); draft and revise motion to amend class definition (1.5); emails re: same (.1); t/c with expert (.1); emails with expert (.1); emails with co-counsel re: expenses (.1)	2.60
7/16/2012	Draft and revise motion for prelim app (.8); circulated for edits to same (.1); draft and revise motion to amend class definition and circulated for comments to same (.5); exchange of emails with Court clerk (.1); t/c with KN and SM re: dates for inclusion in settlement (.2); draft and revise settlement (1.4)	3.10
7/17/2012	Worked on editing motion for prelim app and draft of settlement documents (.5); t/c with SM to review changes to settlement (.3); review of class size and editing of documents re: same (1.2); reviewed cases on attorneys' fees (1.5)	3.50

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7/18/2012	Worked on draft of settlement and circulated for comment (.2); revised notice and claim form; receipt and review of defendants' edits (1.3); t/c with SM and PB re: notice and claim form (.5); receipt and review of edited versions (.8); revised all documents and recirculated new versions (.2); emails with clients re: status (.2)	4.20
7/19/2012	Continued to draft and revise motion for preliminary approval (1.0); draft and revise motion to amend (1.2); draft and revise settlement agreement , notices and claim forms (.6); multiple emails with parties and co-counsel re: changes and edits (.3); worked on declaration (.7)	3.80
7/20/2012	Continued to draft and revise motion for preliminary approval (1.5); draft and revise motion to amend (1.0); draft and revise settlement agreement, notices and claim forms (1.0); emails with clients re: declarations (.2); draft and revise my declaration in support of motion for prelim. app. (.2); multiple emails re: finals edits to settlement agreement; obtained executed version and circulated (.2); prepared extended email re: deadlines (.2); emails with SS on getting documents finalized (.2)	4.50
7/22/2012	Emails with Evans re: typo to settlement agreement (.1); emails to KN and MB re: need to have addendum to settlement agreement (.3)	0.40
7/23/2012	Emails regarding necessary addendum to correct scrivener's error in settlement agreement (.2); drafted addendum (1.0); emails circulating and receiving signed addendum (.3); emails with CF re: drafting order granting motion to amend (.2); emails with HG re: content of declaration (.1); updating of expenses (.1); emails with RP obtaining signed declaration (.2); updating of client declarations and emails to WR re: same (.1); emails with Prutsman re: Rust issues (.2); phone calls with SS working on appendix and all exhibits to be included (.1); receipt and review of appendix (.2); emails with co-counsel regarding final version of motion for prelim. app. after making edits to same (.3); final edits to motion to amend (3.9); prepared for and filed motions and proposed orders (.5)	7.40
7/27/2012	Receipt and review of Court's orders on preliminary approval and motion to amend (.7); multiple emails with REN and WR re: to-do list for notice and claim form distribution (.2)	0.90
7/28/2012	Emails to WR and JP re: scheduling and notice issues	0.10
7/30/2012	Emails from WR and SS re: calendaring and damage calculations	0.10
7/31/2012	Multiple emails regarding damages (.2); multiple emails re: conference with Rust (.2); emails and t/c with WR re: matters discussed on conference call (.4); t/c with KN and SM re: issues raised by PB on call (timing of moving to new plan) (.7)	1.50

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8/1/2012	Receipt and review of damage calculations and emails re: same	0.30
8/2/2012	Emails re: calendaring of dates and attention to same	0.20
8/3/2012	Receipt and review of sample briefs regarding attorneys' fees (.3) ; receipt and review of initial drafts of script and timeline from Rust (.8).	1.10
8/5/2012	Located and forwarded materials to co-counsel for inclusion in Rust claim packet and emails re: same	0.30
8/6/2012	Receipt and review of multiple emails regarding materials needed by Rust for claim packet	0.20
8/7/2012	Receipt and review of updated scripting for Rust website and call-center (.2); emails re: status of mailer with SM and Rust (.2); t/c with WR and SM and KN re: issues relating to disability recipients (.4); analysis of notice and briefing in light of disability recipient issue (.1); receipt and review of email from CourT (.1); t/c with WR and GS re: response to email on necessity for hearing (.3); review of edits to Rust materials (.2).	1.50
8/8/2012	Receipt and review of updated scripting for Rust website and call-center (.2); emails re: status of mailer with SM (.2); receipt and review of draft website (.2); review of materials in preparation for hearing (.5); review of issues relating to disability payment recipients (.3)	1.40
8/9/2012	Prepared for oral hearing (1.0); meeting with co-counsel and defense counsel (.2); participated in status hearing (.5); emails re: revision to claim form and class notice (1.0); review of updated mailers (.2); multiple emails with co-counsel and defense counsel regarding agreement to treat certain retirees as class members (.3); review of email with Rust re: additional class members (.3); receipt and review of order on notice and claim form (.3); reviewed and suggested to Rust additional changes to class notice to make it conform to notice (.5); began draft of motion to make changes to class notice and claim form (1.1)	5.40
8/10/2012	Worked on changes to drafts to notice and claim form (1.1); draft and revise draft of filing motion; (.7) multiple emails re:same exchanging drafts with co-counsel and opposing counsel (.3); attention to filing same (.2); receipt and review of website and made changes to same (.2); research and emails regarding location of representative of estate of deceased class member (2.0); emails re: need for additional mailer to class for missing material (.1)	4.60
8/13/2012	Multiple emails regarding additional mailing (.3); receipt and review of drafts (.4); approved drafts; (.1); emails re: cover letters (.1)	0.90
8/14/2012	Multiple emails regarding class questions (.2); eligibility requirements (.2); receipt and review of class statistics (.3)	0.70

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8/15/2012	Emails re: class member questions (.3); sent and responded to emails re: questions with PB (.3)	0.60
8/16/2012	Evaluation of class members damages (.2); response to emails re: class member damages (.1); t/c with WR and class members (.4); creation of documents for class damage analysis (.5)	1.20
8/17/2012	Evaluation of class members damages (.3); response to emails re: class member damages (.1); t/c with WR and class members (.4)	0.80
8/20/2012	T/c with WR re: fee briefing (.2); receipt and review of brief (1.1); legal research re: issues raised in brief (.5)	1.80
8/21/2012	T/c with WR re: fee brief (.2); t/c with RP re: fee brief (.1); emails with SS re: class member questions (.3); extended t/c with class member re: questions (.5); legal research re: fee brief issues (.4)	1.50
8/24/2012	Edited fee brief (1.2); compiled exhibits (1.0); finalized declaration (.4); t/c with counsel (.3)	3.90

1211.90

\$600

\$	727,140.00
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EXHIBIT 5

CROWLEY NORMAN LLP
Transaction Detail by Account
January 1, 2008 through August 24, 2012

Date	Num	Name	Memo	Amount
2181- Evans v Sterling				
2/5/2008	Inv. 2007-0752	Accurate Reporters, Inc	Evans v. Sterling # 2181	1,119.25
3/11/2008		Littler Mendelson	Evans v Sterling	595.51
3/11/2008		Jenner & Block	Evans vs Sterling	7,000.00
4/16/2008		Jenner & Block	Evans v Sterling Expert	725.00
5/28/2008		Burrow Parrott & Crowley Douglas ...	West Law	121.53
6/17/2008	Inv. 395-51522	Hay Group, Inc.		7,117.50
8/21/2008		American Express	Meals	44.12
9/24/2008		AT & T	0581549604001	103.07
10/15/2008	Inv. 2-955-21730	FedEx		26.87
11/20/2008		AT & T	Conference Calls	348.80
1/14/2009		AT & T	Conference Call	360.92
2/16/2009	Inv. 9-086-04395	FedEx	Delivery	83.53
4/8/2009		David G. Elkins	Witness Fee	10.00
4/16/2009		Dennis Fitzgerald	Process Server	80.00
5/20/2009		American Express	Travel	306.68
6/19/2009		American Express	Meals	9.28
7/13/2009		Hot Shot Delivery	Delivery	20.79
7/13/2009		American Express	Travel	368.89
8/20/2009		American Express	Meals	71.27
8/20/2009		American Express	On Line Research	7.95
8/20/2009		AT & T	Conference Calls	387.03
9/9/2009		Jenner & Block	Expert Testimony	3,369.56
9/14/2009		Unilev Management Corporation	Air conditioning 9/3/09	330.00
9/14/2009		Unilev Management Corporation	Air conditioning 9/7/09	220.00
9/14/2009		Unilev Management Corporation	Air conditioning 9/12-13/09	605.00
9/18/2009	Inv. 252309	Hot Shot Delivery	Delivery	26.40
9/18/2009	Inv. 252309	Hot Shot Delivery	Delivery	26.46
9/19/2009		Jenner & Block	Expert	4,942.23
9/22/2009		Jenner & Block	Expert Testimony	451.52
10/12/2009		FedEx	Delivery	24.64
10/14/2009	Inv. 606187CR	Complete Legal, Ltd	Depositions	918.50
10/14/2009	Inv. 607038CR	Complete Legal, Ltd	Depositions	2,465.95
10/14/2009	Inv. 606189CR	Complete Legal, Ltd	Deposition	1,420.10
10/14/2009	Inv. 605044CR	Complete Legal, Ltd	Depositions	1,695.50
10/14/2009	Inv. 605036CR	Complete Legal, Ltd	Depositions	1,865.15
10/21/2009		American Express	Travel	799.60
10/21/2009		American Express	Meals	29.39
10/22/2009		Pacer Service Center	Court Costs	15.70
10/22/2009	Inv. 9149250	Jenner & Block	Expert Testimony	371.81
10/23/2009		Hot Shot Delivery	Delivery	20.79
11/3/2009		A & E - The Graphic Complex	Trial Preparation	86.76
11/13/2009	Inv. #3362	Unilev Management Corporation	Air Conditioning	715.00
11/24/2009		American Express	Travel	-799.60
11/24/2009		American Express	Meals	76.55
11/24/2009		American Express	Trial Prep	228.84
12/22/2009		American Express	Filing Fees	11.84
12/22/2009		American Express	Meals	51.14
1/27/2010		Pacer Service Center	Court Filing	2.32
3/2/2010		Jenner & Block	Expert Testimony	18,789.90
4/5/2010		Walt D. Roper	Sterling Expert Bill Jenn...	-9,452.59
10/19/2010		Gillespie, Rozen & Watsky	Evans vs Sterling	-4,942.23
3/18/2011		Jenner & Block	Return of overpayment	-725.00
12/21/2011		Hay Group, Inc.	Expert	6,002.20
1/17/2012		Pacer Service Center	Court Document Research	5.12
1/24/2012		American Express	Meals	49.78
2/14/2012		Christopher Nolland	Mediation	3,500.00
2/14/2012		Crowley Norman	Postage	44.29
2/14/2012		Crowley Norman	Copies	1,719.45
2/14/2012		West Payment Center	On-Line Research	15.99
2/14/2012		AT & T	Conference Call	248.76
2/14/2012		Gillespie, Rozen & Watsky	Sterling Mediation Reim...	-1,166.67
2/14/2012		The Law Offices of Walt D. Roper,...	Sterling Mediation Reim...	-1,166.67
2/24/2012		American Express	Travel	392.10
3/22/2012		American Express	Travel	27.00
4/9/2012	Inv. 7-838-51948	FedEx	Delivery	27.94
4/23/2012		Pacer Service Center	On-Line Research	1.68
5/11/2012	Inv. 164971	Carol Davis Reporting, Records an...	Copy of Transcript	1,307.88

11:01 AM
08/24/12
Accrual Basis

CROWLEY NORMAN LLP
Transaction Detail by Account
January 1, 2008 through August 24, 2012

Date	Num	Name	Memo	Amount
5/18/2012	INV. 395-52700	Hay Group, Inc.	Expert	4,295.20
5/23/2012		American Express	Travel	18.00
5/23/2012		American Express	Meals	7.31
5/30/2012		Crowley Norman	Postage	8.66
7/18/2012	Inv. # 39552723	Hay Group, Inc.	Expert	4,350.27
8/24/2012		Richard J. Burch	Expert	10,000.00
Total 2181- Evans v Sterling				<u>72,237.51</u>
TOTAL				<u>72,237.51</u>

Tabs3 Detail Work-In-Process Report
Crowley Douglas & Norman, LLP

Client: 2181.00C Evans

Evans

Contact:

Primary Timekeeper: 4 RN Category: 7 Miscellaneous
 Secondary Timekeeper: 4 RN Draft Template: 00000001 Rate Code: 1
 Originating Timekeeper: 4 RN Final Template: 00000001 Date Opened: 10/09/2007
 Previous Balance: 0.00

Date	Tmkr	Cat	Src	H	T	B	R	Ref #	Rate	Units	Hours Worked	Hours to Bill	Write-Up/ Down Hrs	Amount	Write-Up/ Down Amt	Description
Expenses																
08/16/2007	4 RN	A			16									24.17		DELIVERY - Federal Express
09/26/2007	4 RN	A			29			1						298.77		COPIES - CDS
10/04/2007	4 RN	A			16			3						34.10		DELIVERY - Federal Express
11/06/2007	4 RN	A			11			4						100.00		COURT COSTS - State Process Services
12/13/2007	4 RN	A			16			5						34.24		DELIVERY - Federal Express
12/27/2007	4 RN	A			25			6						425.69		MEALS - American Express
01/29/2008	4 RN	A			15			7						467.91		DEPOSITION - CDS Capitol
Total Billable Expenses															1384.88	

RECAP														
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Fees:	0.00	Previous Balance:	0.00													
Expenses:	1384.88	Payments/Credits:	0.00													
Advances:	0.00															
Total WIP:	1384.88	Balance Due:	0.00													1384.88
A/R:	0-30	31-60	61-90	91-120	121-180	181+										
	0.00	0.00	0.00	0.00	0.00	0.00										

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ROBERT E. EVANS, ET AL. §
§
Plaintiffs, §
§
v. § **CAUSE NO. 4:07-CV-0625**
§
STERLING CHEMICALS, INC., §
ET AL., § **CLASS ACTION**
§
Defendants. §

**DECLARATION OF WALT D. ROPER IN SUPPORT OF PLAINTIFFS' UNOPPOSED
APPLICATION FOR AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF
EXPENSES UNDER ERISA §502(G), REQUEST FOR INCENTIVE AWARDS TO
CLASS REPRESENTATIVES AND MEMORANDUM IN SUPPORT**

I, Walt D. Roper, declare as follows:

Introduction

1. I am an individual over the age of 18. I am the name partner in The Roper Firm, P.C., a law firm based in Dallas. I am Counsel for the Plaintiffs and the Class in this matter. I have personal knowledge of the facts set forth below, and if called to testify, could and would do so competently. I submit this declaration in support of Plaintiffs' Unopposed Application for Award of Attorneys' Fees and Reimbursement of Expenses Under ERISA §502(g), Request for Incentive Awards to Class Representatives and Memorandum in Support.

Personal and Professional Background

2. I received a B.A. in History from Baylor University in 1989. I received a J.D. in 1992 from the Tulane University School of Law. Upon graduation from Tulane, I worked at Reich & Binstock in Houston, practicing primarily in the area of toxic torts. From February, 1994 until May, 1999, I was an attorney at the Law Offices of Fred Misko, Jr., where I practiced in the areas of products liability, toxic tort and class action. My practice during that period covered a broad range of issues including risk assessment, groundwater contamination, lead poisoning, pesticide toxicity, personal injury and property damage claims, export of hazardous waste and the environmental aspects of international trade. During that time, I spoke at several seminars, including: "International Liability: When Is It An Issue and How To Avoid It?" Fifth Annual Conference, Texas-Mexico Bar Association, Mexico City, October, 1998; "Preparing,

Trying and Settling Auto Collision Cases," State Bar of Texas, Dallas, 1995. I was a co-author of Managing Complex Litigation for the 9th Annual Page Keeton Products Liability and Personal Injury Law Conference, Nov. 2, 1995.

3. In May, 1999 I started my own practice, Roper ★ Pope, L.L.P. Subsequently, our firm name was changed to McLarty ★ Roper ★ Pope, L.L.P. On January 14, 2005, our firm added Johnnie L. Cochran, Jr. as a partner, resulting in the formation of The Cochran Firm – Dallas, L.L.P. On March 1, 2009, I left The Cochran Firm – Dallas, L.L.P. to start The Roper Firm, P.C. Since 1999, I have concentrated my practice in the areas of class actions, medical malpractice, nursing home, and products liability litigation.
4. I accepted a request to be a lecturer on the topic of Nursing Home Litigation at the Texas Trial Lawyers Association's "Staying in the Current" seminar, which was held November 8-12, 2000. In addition, I spoke on "Forum Non Conveniens for Toxic Tort Liability in Louisiana," at the Environmental 2000 Conference: Law, Science and the Public Interest, at Tulane Law School, New Orleans, 2000.
5. I am a member of both the Louisiana bar (1992) and the Texas bar (1993). I have been admitted to the U.S. District Courts for the Eastern, Western and Middle Districts of Louisiana, the Northern, Southern, and Eastern Districts of Texas, as well as the U.S. District Court, District of Arizona. I am a member of the Texas Trial Lawyers Association; the American Association for Justice (formerly Association of Trial Lawyers of America); and the Dallas Bar Association. I am former President of Board of Advocates of the Texas Trial Lawyers Association. I am a board member of the Dallas Trial Lawyers Association.
6. I am AV rated pursuant to the Martindale-Hubbell Peer Review Ratings and I have been recognized by Texas Monthly Magazine as a Texas "Super Lawyer" in the field of Class Actions/Mass Torts for the years 2003-2006 and 2009-2011. I have never had a grievance filed against me nor have I ever been disciplined by any state's bar association.
7. I have extensive experience in consumer class action and mass toxic tort litigation. I was lead counsel for over 1,100 Mexican nationals in a lead and hazardous waste exposure case styled *Flores v. RSR Corporation, et. al.*, No. C95-1004-D1 (D. Ct. Webb Cty. Tex.), and was one of a group of attorneys who represented approximately 26,000 banana plantation workers from twelve countries exposed to dibromochloropropane in suits that were filed in several state and federal jurisdictions. Along with Jim Mitchell, I served as class counsel in *Justice v. Great-West Life Assurance Co.*, No. 94-3155 (D. Ct. Dallas Cty. Tex. Aug. 2, 1995), which was the first nationwide certification of a litigation class in a case involving allegations of sales of defective insurance products. In addition, I was co-counsel for the plaintiffs in a class action styled *Pandolfi, et al v. Viking Office Products, Inc.*, 97 CH 8875 (Cir. Ct. of Cook Cty.).
8. I was appointed as lead class counsel in *George Collins, et al. v. Allstate Insurance Company, et al.*; Cause No. GN200820, In the 53rd Judicial District of Travis County,

Texas, a Texas-wide class action filed against various Allstate entities involving allegations that Allstate Insurance Company engaged in unfair discrimination by virtue of its credit scoring practices, which was settled in 2005.

9. I was appointed as Class Counsel in *Stanton Quesenberry, Individually and on Behalf of All Others Similarly Situated v. Alliant Law Group, PC and Bay Area Credit Service, LLC*; Case 4:09-cv-00414-MHS-ALM; In the United States District Court, Eastern District of Texas, Sherman Division. The *Quesenberry* case was a class action involving violations of the Fair Debt Collection Practices Act which was settled in 2011.
10. I was appointed as co-lead Class Counsel in *Richard J. Lang, Individually and on Behalf of All Others Similarly Situated v. NCH Corporation*; Case 2:10-cv-05729-DMG-FFM; In the United States District Court, Central District of California, Western Division. The *Lang* case was a class action involving violations of the California Labor Code which received final approval in January, 2012. Judge Dolly M. Gee, the U.S. District Court Judge presiding over the case, remarked at the final fairness hearing that “class counsel achieved an excellent result” and congratulated class counsel on doing “a fine job.” Reporter’s Transcript of Final Fairness Hearing, January 9, 2012, at 12:11-12; 14:7-8.
11. I am presently serving as Plaintiffs’ co-counsel in *Conrad v. Franklin Collection Service, Inc.*; Case 3:10-cv-02196-M; In the U.S. District Court for the Northern District of Texas, Dallas Division. This case involves violations of the Federal Debt Collection Practices Act. A class action settlement has been reached and is awaiting preliminary approval.

History of the Case

12. Class Counsel began work on this case in January, 2007 after we were contacted by Robert Evans. This led to an investigation that revealed that, in our opinion, the Defendants had improperly reduced benefits. After a significant amount of research and investigation, we concluded that the claim had merit and should be prosecuted.
13. During the course of evaluating and investigating this action, we had extensive conversations with potential plaintiffs and affected class members. Ultimately, Robert Evans, Harold Hamilton, and Dennis Harthun requested we file suit on their behalf, and agreed to serve as class representatives. These three met the class definition, having retired from Sterling Chemical. Messrs. Evans, Hamilton, and Harthun were willing to assume the burdens and responsibilities required of a class representative and have done so since the inception of this litigation.
14. After a thorough investigation, numerous discussions with the class representatives, a review of documents, and an analysis of ERISA law, Class Counsel drafted and filed the complaint on February 16, 2007. We concluded that the best course was to file suit in the Federal District Court for the Southern District of Texas.

15. I have reviewed the July 23, 2012 Declaration of R. Martin Weber, Jr. (Doc. 228-2) and its description of this case's procedural history, settlement efforts, contested issues, class definition, settlement terms, and agreed claims process and notice program. I confirm that it accurately summarizes those aspects of the litigation within my personal knowledge.
16. In its November 9, 2008 Memorandum Opinion and Order (Doc. 101), this Court appointed R. Martin Weber, Jr., Hal Gillespie, and myself as Class Counsel. My role as Class Counsel has been to serve as one of the three primary attorneys in the underlying litigation at the District Court level, and I have been actively involved in the prosecution of this matter on a day-to-day basis since it was filed in 2007. In this role, I was instrumental in the prosecution of the litigation, and over the course of the last five years I have engaged in countless communications with the Class Representatives and Defendants, taken depositions, interviewed potential witnesses, prepared the Class Representatives for deposition and trial, presented Class Representatives for deposition and at trial, performed legal research, reviewed and analyzed documents, assembled and drafted pleadings, briefed numerous issues related to liability and certification and damages, and drafted and responded to discovery, among other things.
17. From the inception of this litigation, beginning with the call from a potential class representative in January, 2007, Class Counsel have aggressively prosecuted this case and vigorously represented the best interests of Plaintiffs and the Class. Class Counsel are skilled and experienced in complex litigation, including consumer actions and class actions. The skills and experience of the law firms handling the case for the Plaintiffs complimented one another and allowed us to efficiently and aggressively pursue the present litigation. Every reasonable effort was made not to duplicate work product and to enhance the efficient prosecution of this litigation. In fact, Class Counsel had every reason and incentive to avoid extra, unnecessary or duplicative work.
18. The efforts described above provided Class Representatives and their experienced counsel with sufficient information to thoroughly analyze the strengths and weaknesses of the case, and subsequently negotiate and consummate the Stipulation of Settlement.

The Settlement

19. As a result of the work that Class Counsel put into this case, we were able to negotiate an extremely favorable settlement on behalf of the Class. A fully executed version of the Settlement Agreement is attached as Ex. 1 to the previously filed Declaration of R. Martin Weber, Jr. in Support of Preliminary Approval.¹ The settlement achieved in this case is the product of extensive and complex arm's-length negotiations conducted by counsel for Plaintiffs and the Class, on the one hand, and Settling Defendants, on the other hand. There is not, nor could there be, any evidence of collusion regarding the

¹ Please refer to the Declaration of R. Martin Weber, Jr. (Doc. 228-2) for a detailed discussion of the proposed settlement and an analysis of the settlement's estimated value.

Settlement. There was virtually no point in the settlement negotiations nor any aspect of the settlement itself that was not the result of considerable negotiation between the parties. Consequently, the negotiation of this settlement was quite protracted, as evidenced by the detailed time records of Class Counsel.

20. The Stipulation of Settlement, at ¶29, defines the following class:

All persons, and the surviving spouses and dependents of such persons, who accepted Sterling's offer of employment within one day after the Closing Date on the purchase of the Cytec fibers business by Sterling Chemicals ("Closing Date" was approximately January 31, 2007) or in the case of an employee who returned to work within six months from taking temporary disability leave, within one day after the date of return from temporary disability, and became employees of Sterling effective as of the later of such acceptance and the Closing Date, who, as of the Closing Date (i) was at least 55 years old and had completed at least 10 years of service with any of the Cytec Parties, (including, prior to January 1, 1994, American Cyanamid Corporation) or any of their respective Affiliates, (ii) at July 31, 1990, had combined age plus years of service with American Cyanamid Corporation equal to at least 65, or (iii) is identified on Schedule 5.05(f) of the Asset Purchase Agreement and who remained in the employment of Sterling Fibers, Inc., until the later of such Acquired Employee's 55th birthday or the time such employee had at least 10 years of service with the Cytec Parties, and who retired from Sterling Fibers (or is a spouse or dependent of such a retiree) and who participated in the Sterling Plans during the Class Period.

Plaintiffs' Counsel has confirmed that the Class is comprised of 99 members.

Opinion Regarding Attorney Fee Award

21. In order to obtain the relief for the Class I have devoted a considerable amount of time, effort, and resources to investigate and prosecute Class Representatives' and the Class's claims. I will continue to accrue time in this case through monitoring and administration of the settlement claims process and through the Final Fairness Hearing.
22. In total, I have spent 1,276.88 hours working on this litigation through August 23, 2012, and continue to expend time on this matter on an almost daily basis. True and correct copies of my personal time records are attached as **Exhibit A**. These hours were reasonable and necessary given the complex nature of the case and the results achieved. The hours are also reasonable under the factors used by the federal courts in the Fifth Circuit to determine and measure such matters.
23. A billing rate of \$600 per hour is reasonable, usual and customary for experienced class action attorneys in Texas and around the country who have been in practice for twenty years. For example, in January 2012, Judge Dolly Gee, in Case No. 2:10-cv-05279; *Lang v. NCH Corporation*; in the United States District Court, Central District of California,

approved a fee award in which my lodestar was submitted on the basis of \$600/hour. (*Lang* was a class action involving alleged violations of California labor law, and was not as complex as the present case.)

24. The total product of a rate of \$600.00 times hours worked of 1,276.88 is \$766,128.00. Thus, my personal lodestar is \$766,128.00 (this is actually less than the eventual total of what I have spent and will continue to expend on this case through final resolution).
25. In total, my paralegals have spent 368.77 hours working on this litigation through August 23, 2012. My paralegal Sara Stevens continues to expend time on this matter on an almost daily basis. True and correct copies of my paralegals' time records are attached as **Exhibit B**. These hours were also reasonable and necessary given the complex nature of the case and the results achieved. The hours are also reasonable under the factors used by the federal courts in the Fifth Circuit to determine and measure such matters.
26. A billing rate of \$95.00 per hour is reasonable, usual and customary for paralegal work in this jurisdiction. The total product of a rate of \$95.00 times hours worked of 368.77 is \$35,033.15. Thus, the paralegal lodestar is \$35,033.15 (this is actually less than the eventual total of what my paralegals have spent and will continue to expend on this case through final resolution).
27. In the present case, the lodestar calculation for my firm would, as of the date of execution of this declaration, be as follows:

	Hrs.	Hourly Rate	Lodestar
Walt D. Roper	1276.88	\$600/hr	\$766,128.00
Paralegals	368.77	\$95/hr	\$35,033.15
		TOTAL	\$801,161.15

In my opinion, \$801,161.15 represents a reasonable value of the legal services rendered by my firm in this matter for the time period from January 19, 2007 to August 23, 2012.

28. I anticipate expending an additional 30 hours of billable time working on this case up through the Final Fairness Hearing, assuming that there are no objections that require additional briefing. If there are such objections, I anticipate expending an additional 45 hours (inclusive of the aforementioned 30 hours) of billable time working on this case up through the Final Fairness Hearing.
29. While difficult to quantify with specificity, my firm is a relatively small Plaintiffs' firm that is constrained in the number of cases that it can accept and prosecute at any given time. As a result, it is reasonable to conclude that the acceptance of the present case has, at least to some extent, precluded other employment opportunities by the firm. Moreover, as with all of the firm's cases, I have pursued this matter on behalf of the class entirely on a contingency basis. As a consequence (and for the reasons set forth in detail in the Fee Application), I believe that an attorneys' fee in the amount of \$1,675,000.00 is

appropriate and necessary in order to adequately reward Class Counsel for the risks undertaken in prosecuting this litigation; the extraordinary results achieved by virtue of the proposed class action settlement; and in order to incentivize the future prosecution of similarly worthwhile and meritorious claims.

Litigation Expenses

30. In addition, my firm (and its predecessor) have incurred reasonable and necessary case expenses of \$58,232.05, which include expenses such as expert costs, filing fees, deposition costs, travel expenses, and other categories of reasonable and necessary expenses. A summary of my expenses are attached as **Exhibit C**. Moreover, I will incur additional litigation expenses as a result of travel to and from Houston in connection with the Final Fairness Hearing scheduled for October 10, 2012.

Opinion on Enhancement Awards for Class Representatives

31. It is my opinion that Class Representatives Robert Evans, Harold Hamilton, and Dennis Harthun are each entitled to \$10,000.00 as an enhancement award. As detailed more specifically in each of their Declarations which were filed in support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and Memorandum of Law in Support (Doc. 228-5 at 132-156), Messrs. Evans, Hamilton, and Harthun worked closely with Class Counsel in this matter, participating in numerous calls and meetings, and providing documents and document analysis on a regular basis; participating in the mediation, providing insight and analysis of claims and defenses that could not have been performed without the information they possessed from their time and experience in the employ of Sterling Fibers and Sterling Chemical; participating in pretrial preparation, providing valuable insight, and attending trial (although only Mr. Evans testified at trial, Messrs. Hamilton and Harthun were fully prepared to testify). In pursuing this matter, Messrs. Evans, Hamilton, and Harthun also took on personal risk. Specifically, an adverse judgment in this case could have rendered each of them personally responsible for costs and attorneys' fees.
32. Consequently, based upon the time and efforts of Messrs. Evans, Hamilton, and Harthun and their willingness to take on the risk attendant to this case, they are each entitled to a \$10,000.00 enhancement award.

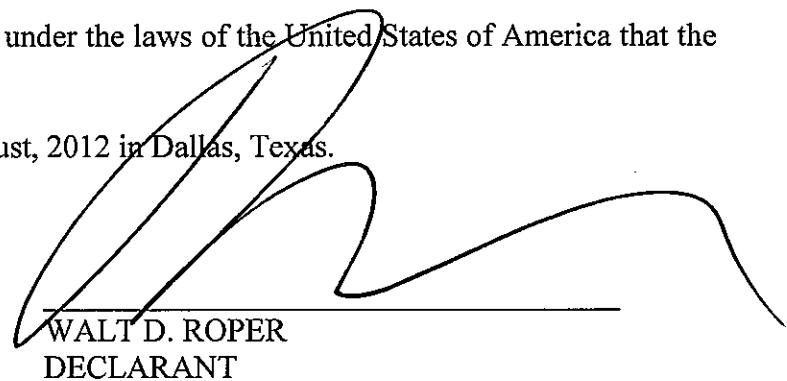
Conclusion

33. Statement Pursuant to FRCP 23 and 54. Pursuant to Federal Rules of Civil Procedure 23(e) and 54 (d)(2)(iv), I state that all agreements in this litigation, including settlement agreements, have been filed herein and there are no agreements for services related to this cause or settlement that have not been disclosed to this Court
34. In conclusion, Class Counsel requests a fee in the amount of \$1,675,000.00 and recoverable and necessary expenses award in the amount of \$182,833.97. This award is

reasonable, necessary and just under an applicable lodestar analysis and governing Fifth Circuit law.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 24th day of August, 2012 in Dallas, Texas.



A handwritten signature in black ink, appearing to read "WALT D. ROPER", is written over a horizontal line. Below the line, the words "DECLARANT" are printed in capital letters.

WALT D. ROPER
DECLARANT

Exhibit A

**The Roper Firm
Sterling Chemicals
Attorney Time**

	Date	Memo	Qty
	01/19/07	Reading Email and Memo from David Jones re: Cytec Employees	0.5
	01/19/07	Phone call with Vaughan Finn re: Sterling Retirees case to discuss specifics of case	0.5
	01/20/07	Reading Email from Vaughan Finn	0.03333
	01/22/07	Reading and responding to email from Vaughan Finn re: conference call with Ira Goldman	0.1
	01/22/07	Conference call with Vaughan Finn and Ira Goldman to discuss specifics of case	0.50
	01/22/07	Reading Sterling plan documents received from Ira Goldman	0.50
	01/22/07	Reading email from Bob Evans	0.10
	01/24/07	Reading 1994 and 1995 Cytec SPDs received from Vaughan Finn	0.50
	01/26/07	Reading email from Marty Weber re: Memo on Cytec Employees	0.08333
	01/29/07	Reading email from Bob Evans and attached letter to Department of Labor	0.25
	01/29/07	Reading email from Vaughan Finn and attached 02/21/03 letter from Sterling	0.16667
	02/01/07	Emails to and from Hal Gillespie re: meeting with Marty Weber	0.10
	02/05/07	Sending email to Marty Weber and Hal Gillespie re: filing complaint and reading their responses	0.25
	02/06/07	Reading email from Bob Evans and attached spreadsheet of Sterling Retirees	0.15
	02/06/07	Reviewing Sterling binders from Vaughan Finn	4.25
	02/06/07	Call to Bob Evans re: details of claim	0.75
	02/07/07	Reviewing Sterling binders and working on complaint	4.00
	02/08/07	Working on complaint	5.00
	02/08/07	Working on complaint	5.00
	02/08/07	Call to potential plaintiffs	0.60
	02/12/07	Call from Carol Lanthrip	0.50
	02/12/07	Working on complaint	1.50
	02/12/07	Emailing complaint to Marty Weber, Karla Jackson, and Hal Gillespie	0.30
	02/14/07	Call to Marty Weber	0.10
	02/14/07	Call from Marty Weber to discuss complaint	0.75
	02/14/07	Call from Marty Weber to discuss complaint	0.20
	02/14/07	Email to Marty Weber and Hal Gillespie re: conference call	0.10
	02/14/07	Reading emails from Carol Lanthrip re: contingency fee agreement	0.10
	02/14/07	Reading email from Marty Weber with attached Halliburton opinion	0.25
	02/15/07	Reviewing Marty Weber's modifications to complaint	0.25
	02/15/07	Discussing admittance to practice in S.D. Texas with Kathryn Moore	0.20
	02/15/07	Conference call with Marty Weber and Hal Gillespie re: specifics of complaint	1.20
	02/15/07	Call to Bob Evans re: details of claim	1.00
	02/15/07	Email to Marty Weber & Hal Gillespie re: letter to class members	0.30
	02/15/07	Reading email from Hal Gillespie re: co-counseling agreement edits	0.13
	02/15/07	Reading email from Hal Gillespie and attached caselaw opinions	0.50
	02/16/07	Reading emails from Marty Weber and Hal Gillespie re: jury demand	0.10
	02/16/07	Emailing Marty Weber and Hal Gillespie re: new class rep Dennis Harthun	0.08
	02/16/07	Calls to Bob Evans, Howard Hamilton, Dennis Harthun, Marty Weber, and Hal Gillespie	2.00
	02/16/07	Finalizing complaint	1.00

**The Roper Firm
Sterling Chemicals
Attorney Time**

Date	Memo	Qty
02/16/07	Call to Marty Weber	0.25
02/16/07	Researching address of administrator	0.25
02/16/07	Call to Department of Labor	0.25
02/16/07	Emailing complaint to referring and co-counsel	0.25
02/19/07	Reviewing email from Bob Evans	0.50
02/19/07	Email to Bob Evans responding re: suing Sterling Fibers	0.50
02/19/07	Call from Marty Weber	1.00
02/19/07	Reading email from Marty Weber re: pre-trial documents and dates	0.17
02/19/07	Email to Marty Weber and Hal Gillespie re: amended class definition	0.10
02/19/07	Reading email from Marty Weber re: Section 1114	0.17
02/20/07	Call from Marty Weber re: service	0.70
02/20/07	Talking with Kathryn Moore re: service	0.20
02/20/07	Responding to Harold Hamilton's email	0.10
02/20/07	Reading email from Bob Evans re: Sterling Fibers	0.08
02/20/07	Reading emails from Marty Weber and Kathryn Moore re: service on Defendants	0.13
02/26/07	Reading email from Vaughan Finn re: filing of complaint	0.10
02/28/07	Responding to Karla Jackson's email re: filing of certification of interested persons	0.20
02/28/07	Email to Bob Evans re: box of documents	0.20
03/02/07	Reading emails from Marty Weber re: Certificate of Interested Persons	0.10
03/12/07	Reading email from Bob Evans re: shipment of box of documents	0.05
03/13/07	Reading Defendants' Answer	0.33
03/15/07	Reading and responding to email from Harold Hamilton re: class members	0.08
03/04/07	Reading and responding to Bob Evans's email re: various case issues	0.50
04/06/07	Reading email from Bob Evans re: Sterling contact info	0.08
04/10/07	Reviewing scheduling order and local rules	0.50
04/10/07	Call to Marty Weber to discuss filing of proposed scheduling order and 26(f) conference	0.40
04/10/07	Call to Karla Jackson to discuss 26(f) conference	0.20
04/10/07	Leaving message for Eve McFadden re: 26(f)	0.10
04/10/07	Call to Eve McFadden to schedule 26(f) conference	0.20
04/10/07	Email conference call time to co-counsel	0.20
04/12/07	Preparing for 26(f) conference call	0.50
04/13/07	Pre conference call with co-counsel	0.70
04/13/07	26(f) conference	0.50
04/18/07	Reading email from Karla Jackson and attached draft 26(f) filing	0.20
04/20/07	Reviewing 26(f) filing and call to Karla Jackson	0.50
04/25/07	Reading emails from Karla Jackson and Nitin Sud re: Joint Case Management Plan	0.25
05/07/07	Reading emails from Karla Jackson and Marty Weber re: conference call with Court	0.15
05/08/07	Reading emails from Marty Weber and Karla Jackson re: ERISA experts and experts' bios	0.50
05/08/07	Reading email from Marty Weber and attached Haliburton summary judgment briefing and order	0.50

**The Roper Firm
Sterling Chemicals
Attorney Time**

Date	Memo	Qty
05/15/07	Reviewing Judge's scheduling order	0.10
05/15/07	Talking to Kathryn Moore about entering deadlines	0.10
05/15/07	Call from Eve McFadden re: stock purchase agreement	0.10
05/15/07	Emailing news to co-counsel	0.10
05/15/07	Reading 10k sent by Bob Evans and forwarding to co-counsel	0.20
05/15/07	Reading email from Marty Weber re: APA	0.05
05/15/07	Call from Marty Weber re: asset purchase agreement and liability of Sterling Fibers	0.75
05/16/07	Email to Karla Jackson and Hal Gillespie re: APA	0.10
05/16/07	Email to Karla Jackson and Hal Gillespie re: dropping Sterling Fibers from suit and reading their responses	0.10
05/18/07	Reviewing Initial Disclosures	0.20
05/18/07	Call to Karla Jackson	0.30
05/18/07	Conference call with Karla Jackson and Marty Weber re: Initial Disclosure	0.75
05/18/07	Reading email from Eve McFadden re: signed copy of APA	0.05
05/21/07	Reviewing Marty Weber's email re: document categories for disclosure	0.20
05/21/07	Reading email from Marty Weber re: Sterling background	0.05
05/24/07	Reading Marty Weber's 5/21 email re: initial disclosure	0.20
05/24/07	Reading emails from Eve McFadden and Marty Weber re: signed APA	0.17
05/25/07	Reading email from Marty Weber re: dismissal of Sterling Fibers	0.08
05/25/07	Reading email from Marty Weber re: conversation with Kerry Notestine re: Temporary Injunction	0.13
05/30/07	Reading email from Eve McFadden and response from Marty Weber re: dismissal of Sterling Fibers	0.10
06/05/07	Call to Marty Weber re: case status	0.30
06/05/07	Emailing plaintiffs re: case status	0.20
06/05/07	Emailing Joint Venture agreement to co-counsel	0.20
06/06/07	Reading email from Marty Weber to Kerry Notestine re: temporary injunction	0.10
06/06/07	Reading email from Bob Evans re: update on case	0.10
06/26/07	Reading emails from Nitin Sud and Marty Weber re: jury demand	0.17
06/28/07	Reading email from Marty Weber re: Initial Disclosures	0.05
06/30/07	Reviewing and editing RFPs to Sterling	2.10
07/09/07	Reading emails from Marty Weber and Karla Jackson re: Defendants' Motion to Dismiss	0.30
07/16/07	Reading Sterling's Motion to Dismiss	0.50
07/16/07	Reviewing Marty Weber's response to Motion to Dismiss	0.75
07/16/07	Reading Marty Weber's email to Karla Jackson re: Response to Motion to Dismiss	0.08
07/16/07	Call to Marty Weber to discuss Motion to Dismiss	0.50
07/16/07	Reading email from Marty Weber re: calling class reps	0.17
07/17/07	Call to Marty Weber to discuss issues in motion to dismiss	1.00
07/01/07	Call to Edward Batestelli	0.50
07/01/07	Call to Bob Evans	0.50
07/01/07	Finding and printing ALR on SOL ERISA and emailing to co-counsel	0.50

**The Roper Firm
Sterling Chemicals
Attorney Time**

Date	Memo	Qty
07/17/07	Reading and responding to emails from Marty Weber and Karla Jackson re: SOL issue in Motion to Dismiss Response	0.17
07/18/07	Call to Marty Weber re: Rule 15 (c) & briefing	0.50
07/18/07	Conference call with Marty Weber re: Motion to Dismiss Response	1.00
07/18/07	Reviewing plan documents	1.80
07/19/07	Working on Motion to Dismiss Response	8.00
07/19/07	Emailing case opinion to Marty Weber and reading his response	0.15
07/20/07	Working on Motion to Dismiss Response	4.00
07/20/07	Emailing case opinion on SOL issue to Marty Weber and reading his response	0.20
07/20/07	Reading email from Marty Weber to Kerry Notestine re: page limitation for response	0.10
07/22/07	Working on Motion to Dismiss Response	3.00
07/23/07	Working on Motion to Dismiss Response	6.50
07/23/07	Reading email from Marty Weber with attached client declarations and forwarding declarations to clients	0.20
07/24/07	Working on Motion to Dismiss Response	3.00
07/24/07	Call to Marty Weber	0.50
07/24/07	Reading email from Marty Weber to Ed Batistelli attaching declaration	0.10
07/24/07	Reading email from Marty Weber to Kerry Notestine re: additional time to file response	0.10
07/25/07	Reading emails from Marty Weber and Karla Jackson re: conference call	0.10
07/25/07	Reading email from Marty Weber re: Ed Batistelli declaration and forwarding to Kathryn Moore	0.10
07/25/07	Conference call with Marty Weber and Karla Jackson re: Response to Motion to Dismiss	0.50
07/25/07	Reading email from Marty Weber re: Dennis Harthun	0.10
07/26/07	Email to Vaughn Finn and Ira Goldman re: update	0.20
07/26/07	Reading email from Karla Jackson re: her changes to Response to Motion to Dismiss	0.10
07/27/07	Composing email to plaintiffs re: update and attaching PDFs	0.30
07/29/07	Reading email from Ira Goldman re: Response to Motion to Dismiss and case issues and forwarding to Marty Weber	0.20
08/02/07	Reading emails from Marty Weber and Nitin Sud re: extension for document production	0.10
08/03/07	Reading emails from Marty Weber and Nitin Sud re: document production and call to Marty Weber to discuss	0.50
08/10/07	Going through documents produced by defendants	2.50
08/10/07	Call from Marty Weber re: document production	0.50
08/10/07	Emailing co-counsel re: insurance documents produced and reading response	0.17
08/13/07	Emailing Marty Weber the hot document numbers	0.20
08/13/07	Researching breach of fiduciary duty law	0.80
08/20/07	Responding to Marty Weber's email re: reply deadline	0.20
08/20/07	Call from Marty Weber re: strategy of filing documents and opposing reply	0.40
08/23/07	Reading email from Marty Weber re: Order on Motion to Dismiss	0.10
08/24/07	Reading emails from Ira Goldman and Vaughan Finn re: Order on Motion to Dismiss	0.10
08/27/07	Emailing with co-counsel re: conference call	0.10
08/28/07	Conference call with Sterling co-counsel re: amending petition and compelling discovery	1.00

**The Roper Firm
Sterling Chemicals
Attorney Time**

Date	Memo	Qty
08/30/07	Reading email from Marty Weber attaching Motion to Amend and Third Amended Complaint and reviewing documents	0.50
09/04/07	Making edits to Third Amended Complaint and emailing to Marty Weber	0.50
09/04/07	Reading Marty Weber's email to Kerry Notestine re: Motion to Amend	0.10
09/05/07	Reading Sterling Order on Motion to Dismiss	0.35
09/05/07	Reviewing and editing Marty Weber's draft Third Amended Complaint	1.15
09/07/07	Reading emails from Eve McFadden and Marty Weber re: deposing Plaintiffs	0.20
09/10/07	Reading emails from Marty Weber re: response to Motion for Reconsideration	0.15
09/12/07	Reading email from Karla Jackson re: location of Plaintiffs' depos	0.10
09/12/07	Reading email from Karla Jacson re: research on response to Motion for Reconsideration	0.10
09/13/07	Call from Marty Weber re: document production to Defendants	0.25
09/13/07	Email to Nitin Sud informing him of delay	0.25
09/13/07	Going over indexing project with Hillary McAllister	0.25
09/14/07	Reviewing Hillary McAllister memo re: corporate representative deposition locations	0.15
09/14/07	Emailing memo to co-counsel	0.10
09/14/07	Call to Karla Jackson re: this issue and discussing letter	0.30
09/14/07	Call to Eve McFadden re: depositions of plaintiffs	0.20
09/15/07	Reading emails from Marty Weber and Karla Jackson and responding re: calling Court	0.20
09/17/07	Reading email from Marty Weber and reviewing attached final version of Amended Complaint	0.20
09/18/07	Reading email from Karla Jackson re: call to Court	0.10
09/19/07	Reading email from Marty Weber to Karla Jackson re: additional research for response	0.10
09/19/07	Call to Marty Weber re: work on response	0.20
09/19/07	Doing research for response to Motion for Reconsideration	2.50
09/20/07	Drafting piece of response to Motion for Reconsideration on Rule 59(e)	0.75
09/20/07	Reading 7 cases on Rule 59(e)	0.75
09/24/07	Emailing Karla Jackson re: index of documents produced	0.10
09/24/07	Reading Marty Weber's response to Motion for Reconsideration and making revisions	3.00
09/24/07	Working on Response to Motion for Reconsideration	1.00
09/26/07	Reviewing Sterling Response to Motion for Reconsideration and making edits and emailing Marty Weber re: edits	1.00
09/26/07	Reading emails from Karla Jackson and Marty Weber re: documents produced by Defendants	0.10
09/26/07	Reading Karla Jackson's proposed letter to Defendants re: RFPs and sending comments	0.50
09/27/07	Reading email from Karla Jackson with her edits to index of produced documents	0.17
09/28/07	Reading email from Marty Weber with subpoena for Resurgence Asset Management	0.17
10/01/07	Reading Judge's Order on Motion for Reconsideration	0.10
10/01/07	Phone conference with Marty Weber to discuss strategy going forward	0.30
10/02/07	Conference call with Marty Weber re: strategy	0.50
10/03/07	Westlaw research on damages	3.00
10/04/07	Reading subpoena generated by Marty Weber to Bryan Haney	0.20
10/04/07	Reading and responding to emails from Eve McFadden and Marty Weber re: Plaintiffs' depositions	0.20

**The Roper Firm
Sterling Chemicals
Attorney Time**

	Date	Memo	Qty
	10/05/07	Research on Sterling damages	8.00
	10/08/07	Reading emails from Kathryn Moore and Marty Weber re: documents sent by Harold Hamilton	0.20
	10/08/07	Emailing Karla Jackson re: discovery letter and reading her response	0.20
	10/09/07	Reviewing documents produced by Sterling	0.10
	10/09/07	Composing email to plaintiff class members re: progress & discovery	0.75
	10/09/07	Talking with Marty Weber re: strategy and looking at documents	0.50
	10/09/07	Reading email from Marty Weber re: Cytec 2005 plan	0.10
	10/09/07	Conference call with Harold Hamilton and Marty Weber & Karla Jackson	1.00
	10/10/07	Reading email from Marty Weber re: experts	0.05
	10/10/07	Call to Marty Weber to discuss experts	0.20
	10/10/07	Call to Stuart Wohl to leave message re: hiring him	0.10
	10/11/07	Reading emails from Karla Jackson and Marty Weber re: response to discovery letter	0.10
	10/11/07	Reading emails from Eve McFadden and Marty Weber re: scheduling Plaintiffs' depositions	0.20
	10/16/07	Telephone conversation with Stuart Wohl re: being an expert in the case	0.50
	10/16/07	Emailing contact info to Stuart Wohl and reading his reply and reply from Marty Weber	0.20
	10/16/07	Emailing Marty Weber re: proposed schedule for plaintiff deposition	0.20
	10/16/07	Researching damages in Sterling on Westlaw	3.00
	10/17/07	Call to Marty Weber to get depo dates	0.30
	10/17/07	Emailing availability for depositions to Eve McFadden	0.10
	10/17/07	Discussing scheduling of plaintiffs' depositions with Kathryn Moore	0.50
	10/17/07	Working on memo regarding recoverability of various categories of damages	1.50
	10/18/07	Working on memo regarding recoverability of various categories of damages	6.30
	10/19/07	Working on memo regarding recoverability of various categories of damages	3.50
	10/20/07	Working on memo regarding recoverability of various categories of damages	1.00
	10/21/07	Working on memo regarding recoverability of various categories of damages	2.00
	10/22/07	Email to Karla Jackson and Marty Weber re: discovery letter to Defendants and reading her reply	0.20
	10/23/07	Reading email from Kathryn Moore re: Plaintiffs' travel plans for depositions	0.10
	10/23/07	Reading letter re: discovery from Eve McFadden	0.40
	10/24/07	Reading email from Karla Jackson re: new document production	0.05
	10/24/07	Reviewing HillaryMcAllister's case research on damages	6.00
	10/29/07	Conversation with Marty Weber re: Sterling experts and vesting issues	0.50
	10/29/07	Answering Marty Weber's email re: b(3) versus b(1) class certification	0.10
	10/30/07	Reading email from Bob Evans re: case update	0.10
	10/31/07	Conference call with Marty Weber re: experts	0.50
	10/31/07	Call to Hal Gillespie re: experts	0.50
	10/31/07	Looking for experts on Internet	2.00
	10/31/07	Call to David Radtke re: expert recommendation	0.30
	10/31/07	Call to Fred Kilbourne re: expert recommendation	0.20
	11/01/07	Reading email from Fred Kilbourne re: list of experts	0.10

**The Roper Firm
Sterling Chemicals
Attorney Time**

Date	Memo	Qty
11/01/07	Reading letter from Kerry Notestine re: rate increase exception agreement	0.20
11/01/07	Call to Marty Weber to discuss letter from Kerry Notestine	0.10
11/01/07	Email to Marty Weber re: proposed revisions to Kerry Notestine Agreement	0.50
11/01/07	Discussing list of Fred Kilbourne's proposed health care actuaries	0.20
11/02/07	Email to Marty Weber re: list of experts	0.10
11/03/07	Working on memo regarding recoverability of various categories of damages	0.50
11/05/07	Reading Kathryn Moore's email re: potential expert Dale Yamamoto and forwarding to Marty Weber	0.20
11/05/07	Reviewing CVs and resumes of potential Sterling experts	0.50
11/05/07	Reading Marty Weber's email to Eve McFadden re: pretrial agreement	0.10
11/05/07	Reading Marty Weber's email to Nitin Sud re: school records	0.10
11/05/07	Call to Karla Jackson to discuss status of motion to compel	0.10
11/05/07	Reading emails from Kathryn Moore re: Adam Reese and John Schubert	0.17
11/05/07	Working on memo regarding recoverability of various categories of damages	2.00
11/06/07	Finalizing damages memo	8.20
11/06/07	Conference call with Adam Reese, potential expert	0.50
11/06/07	Reading Karla Jackson's email re: Motion to Compel	0.10
11/07/07	Reading Kathryn Moore's email re: conference call with Jan Carstens	0.10
11/07/07	Reading email from Kathryn Moore re: phone conference with Bill Bluhm	0.10
11/07/07	Talking to Marty Weber re: hiring of Adam Reese	0.25
11/07/07	Reading emails from Marty Weber and Karla Jackson re: proposal from Kerry Notestine	0.10
11/07/07	Reading email from Adam Reese re: hiring him	0.10
11/08/07	Calling Marty Weber to discuss experts	0.50
11/08/07	Conference calls with potential experts Bill Bluhm and Jan Carstens	2.00
11/09/07	Reading Karla Jackson's email to Nitin Sud re: certificate of conference for Motion to Compel	0.20
11/09/07	Reading email from Nitin Sud re: holding off on filing Motion to Compel	0.10
11/09/07	Reading Karla Jackson's email re: whether to hold off on filing Motion to Compel and responses from Hal Gillespie & Marty Weber	0.10
11/09/07	Reviewing docs to send to Plaintiffs (exhibits to motions)	0.20
11/09/07	Reviewing RFPs	0.20
11/09/07	Talking to Kathryn Moore about enclosure letter	0.10
11/09/07	Call from Karla Jackson re: RFPs to Plaintiffs	0.10
11/09/07	Reading Cedotal v. Whitney National Bank	0.25
11/12/07	Editing letter to clients re: depo and enclosing exhibits to motions	0.20
11/12/07	Call to Marty Weber re: Kerry Notestine proposal and experts (left message)	0.10
11/12/07	Call from Marty Weber re: Kerry Notestine proposal and experts	0.20
11/12/07	Reading email from Adam Reese re: hiring him	0.10
11/12/07	Reviewing Stand Still Agreement and emailing it to Kerry Notestine	0.30
11/13/07	Reviewing Stand Still Agreement revised by Kerry Notestine and talking to Marty Weber about it	0.75
11/13/07	Reviewing Marty Weber's changes to Stand Still Agreement and emailing response	0.20

**The Roper Firm
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Attorney Time**

	Date	Memo	Qty
	11/19/07	Reading email from Nitin Sud to Karla Jackson re: Motion to Compel	0.30
	11/19/07	Reading email from Kerry Notestine re: Sterling Agreement (11/14/07) & Marty Weber's reply	0.10
	11/19/07	Discussing strategy with co-counsel	0.50
	11/19/07	Emailing Hal Gillespie & Karla Jackson re: need for conference call	0.10
	11/19/07	Reading emails from Kerry Notestine and Marty Weber re: stand still agreement	0.10
	11/20/07	Reviewing documents produced by Harold Hamilton	0.40
	11/20/07	Call to Karla Jackson re: RFP responses	0.20
	11/20/07	Email to Karla Jackson re: my availability and document production for depo	0.20
	11/20/07	Letter to Karla Jackson enclosing Harold Hamilton docs	0.20
	11/20/07	Reading Sterling Motion for Interlocutory Appeal	0.40
	11/20/07	Reading and responding to email from Kathryn Moore re: questions from Harold Hamilton	0.10
	11/21/07	Conference call with Hal Gillespie & Marty Weber re: strategy: which expert to hire, etc.	1.00
	11/21/07	Reading and responding to email from Kerry Notestine re: Motion for Interlocutory Appeal	0.10
	11/26/07	Call to Marty Weber re: damages & SOL	0.40
	11/26/07	Call to Adam Reese	0.35
	11/26/07	Reviewing Sterling documents in prep for talking with Adam Reese	1.50
	11/26/07	Reading email from Karla Jackson re: document production	0.10
	11/26/07	Call to Adam Reese (left message)	0.10
	11/27/07	Reading email from Dennis Harthun re: document production	0.10
	11/27/07	Sorting Sterling documents to review	0.50
	11/27/07	Call to Adam Reese to discuss scope of engagement	0.20
	11/27/07	Reading Judy Nichols deposition from Alcatel case to prepare for depositions of plaintiffs in Sterling case	1.00
	11/27/07	Reading Coffin v. Bowater	0.40
	11/28/07	Email to Karla Jackson re: document production for depositions	0.10
	11/28/07	Reading email from Bob Evans re:document production	0.17
	11/28/07	Email to Kathryn Moore re: travel plans for Plaintiffs' depositions	0.10
	11/28/07	Reading and responding to email from Karla Jackson re: RFP responses	0.10
	11/28/07	Reading and responding to email from Alana Kalantzakis re: memo on damages	0.10
	11/28/07	Reading email from Karla Jackson re: Common Interest Doctrine	0.17
	11/28/07	Reading emails from Bob Evans and Karla Jackson re: document production	0.10
	11/29/07	Reading emails from Marty Weber re: damages	0.20
	11/29/07	Call to Marty Weber re: damages	0.50
	11/29/07	Reading email from Karla Jackson re: documents from Bob Evans	0.10
	11/30/07	Call to Marty Weber re: damages calculations	0.75
	11/30/07	Call to Adam Reese to confirm expert retention	0.30
	11/30/07	Reading emails from Marty Weber and Karla Jackson re: documents withheld	0.17
	11/30/07	Email to Kathryn Moore re: Plaintiffs' arrival plans for depositions	0.10
	12/02/07	Reviewing class rep resentatives' itineraries	0.20

**The Roper Firm
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Attorney Time**

	Date	Memo	Qty
	12/02/07	Reading Defendant's Motion to Dismiss	0.40
	12/02/07	Reading Plaintiffs' Response to Motion to Dismiss	0.50
	12/02/07	Reading court's order on Motion to Dismiss	0.40
	12/02/07	Reading Defendant's Motion for Reconsideration	0.60
	12/02/07	Reading Plaintiffs' response to Motion for Reconsideration and Plaintiffs' Motion to Compel	1.10
	12/02/07	Reviewing docs produced by Sterling for deposition prep	3.00
	12/03/07	Driving to Houston for plaintiff depositions	5.00
	12/03/07	Preparing for plaintiff deposition	2.00
	12/03/07	Meeting with plaintiffs	3.00
	12/03/07	Dinner with Marty Weber to discuss case	2.00
	12/03/07	Reading email from Karla Jackson re: sending documents	0.05
	12/04/07	Meeting with plaintiffs	1.50
	12/04/07	Tendering Bob Evans	8.50
	12/04/07	Dinner with plaintiffs and doing deposition preparation	1.50
	12/04/07	Reading emails from Marty Weber re: Sterling plan documents and retainer of Adam Reese	0.10
	12/05/07	Email to Karla Jackson re: Bates numbers for new documents	0.05
	12/05/07	Preparing for Harold Hamilton depo	4.00
	12/05/07	Tendering Harold Hamilton	7.00
	12/05/07	Dinner with plaintiffs and doing deposition preparation	2.50
	12/06/07	Driving back from Houston after tendering plaintiffs	4.50
	12/07/07	Reading emails from Karla Jackson and Marty Weber re: Response to Motion for Interlocutary Appeal	0.10
	12/10/07	Reviewing Motion for Extension of Time on response to Interlocutary Appeal and emailing Marty Weber	0.30
	12/10/07	Reading Karla Jackson's email re: deadline issues for Interlocutary Appeal and attached case and emailing response	0.50
	12/11/07	Call to Adam Reese to confirm receipt of check and documents	0.20
	12/11/07	Email to Marty Weber to let him know confirmed with Adam Reese	0.10
	12/14/07	Reading and responding to emails from Marty Weber and Karla Jackson re: issues in Response to Interlocutary Appeal	0.15
	12/17/07	Reviewing response to interlocutary appeal motion and call to Marty Weber to advise of changes	1.00
	12/18/07	Reading email from Marty Weber to Kerry Notestine re: request for corporate representative deposition	0.10
	12/19/07	Call to Adam Reese to discuss damages	0.50
	12/19/07	Call to Marty Weber to discuss Adam Reese's damages assessment	0.10
	12/19/07	Reviewing Adam Reese retainer agreement and signing	0.30
	12/20/07	Email to Karla Jackson re: privilege log	0.10
	12/20/07	Email to co-counsel re: Adam Reese's damage numbers after talking to expert	2.50
	12/21/07	Reading email from Marty Weber to Kerry Notestine re: document production	0.10
	12/26/07	Reading and responding to email from Karla Jackson re: privilege log	0.10
	12/27/07	Emailing premium payment spreadsheet to Adam Reese	0.20

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Attorney Time**

	Date	Memo	Qty
	12/27/07	Reading emails from Marty Weber and Karla Jackson re: documents from Carol Lanthrip	0.12
	12/27/07	Reading emails from Marty Weber and Hal Gillespie re: EEOC	0.10
	12/28/07	Reading emails from Marty Weber and Karla Jackson re: need for sur-reply for Motion for Interlocutory Appeal	0.10
	01/02/08	Reading emails from Marty Weber re: Rebecca Hyzer deposition	0.20
	01/02/08	Reading email from Marty Weber to Adam Reese and Adam Reese's response	0.20
	01/04/08	Reading email from Marty Weber re: producing new documents	0.10
	01/04/08	Reading email from Marty Weber to Kerry Notestine re: deposition location	0.05
	01/04/08	Reading email from Harold Hamilton re: expenses for travel	0.05
	01/07/08	Reading emails from Marty Weber and Nitin Sud re: additional documents being produced	0.15
	01/07/08	Reading email from Nitin Sud re: discovery of expert report drafts	0.05
	01/07/08	Conference call with Marty Weber re: expert report	0.50
	01/08/08	Reading email from Marty Weber re: new documents produced by Defendants	0.10
	01/08/08	Call to Marty Weber re: expert report	0.30
	01/08/08	Reading email from Karla Jackson re: Harthun document redaction	0.10
	01/08/08	Call to Adam Reese to discuss report	0.30
	01/09/08	Reading email from Marty Weber re: deposition of Rebecca Hyzer	0.05
	01/09/08	Reading email from Marty Weber re: different groups of Sterling retirees	0.10
	01/09/08	Reading email from Marty Weber to Kerry Notestine requesting expert designation extension	0.05
	01/09/08	Email to Kathryn Moore to request other Plaintiff depo transcripts	0.05
	01/09/08	Reading email from Marty Weber to Catherine Steege re: details of case	0.05
	01/09/08	Call from Marty Weber to discuss need for bankruptcy expert and damage theory for groups 1 & 2	0.30
	01/09/08	Reading email from Adam Reese re: questions on case	0.05
	01/09/08	Conference call with Marty Weber to discuss hiring of BR expert	0.50
	01/10/08	Reading email from Marty Weber re: discovery requests and expert deadlines	0.10
	01/11/08	Reading emails from Marty Weber and Karla Jackson re: MSJ and conference call	0.10
	01/12/08	Reviewing supplemental document production by plaintiffs: 2621-2631	0.10
	01/12/08	Reviewing 1/4/08 letter from Nitin Sud to Marty Weber, with Sterling 2448-2454 attached	0.10
	01/12/08	Reviewing privilege log produced by plaintiffs to defendants on 12/27/07	0.10
	01/12/08	Reviewing documents produced by Plaintiffs to Defendants bates labeled 2561-2620	0.50
	01/14/08	Reading emails from Marty Weber and Kerry Notestine re: discovery requests and depositions	0.10
	01/14/08	Reviewing Adam Reese expert report	0.50
	01/14/08	Conference call to Marty Weber, Hal Gillespie, Karla Jackson to discuss strategy and assignments re: MSJ	0.75
	01/14/08	Reading email from Harold Hamilton re: deposition transcript and forwarding to Kathryn Moore	0.10
	01/15/08	Reading email from Marty Weber re: his discussion with defense counsel re: bifurcation	0.50
	01/15/08	Email to Marty Weber re: Adam Reese's report	0.10
	01/15/08	Call to Adam Reese to discuss his availability prior to Monday and revisions to his report	0.40
	01/15/08	Reading email from Marty Weber re: Bob Evans classification	0.05

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	Date	Memo	Qty
	01/15/08	Reviewing defendant's responses to 2nd set of interrogatories and calling Marty Weber to discuss concerns about Bob Evans, then conferencing Nitin Sud to address discrepancies	1.20
	01/15/08	Reading email from Marty Weber re: retiree rates	0.10
	01/16/08	Call to Marty Weber to confirm no additional changes to Adam Reese's report	0.20
	01/16/08	Reviewing defendant's amended responses to discovery	0.20
	01/16/08	Leaving voicemail for Adam Reese regarding changes that need to be made to his report	0.10
	01/16/08	Reading email from Dennis Harthun re: his deposition	0.10
	01/16/08	Call to Dennis Harthun re: his deposition	0.20
	01/16/08	Emailing deposition to Dennis Harthun and calling him to verify, and emailing to Marty Weber to forward to him	0.30
	01/16/08	Reading email from Marty Weber re: Catherine Steege report	0.10
	01/16/08	Reading emails from Marty Weber and Kerry Notestine re: Rebecca Hyzer deposition	0.10
	01/17/08	Reading email from Adam Reese and attached report	0.30
	01/17/08	Reading Marty Weber's email in response to Adam Reese's report and calling Marty Weber to discuss options	0.20
	01/17/08	Emailing Adam Reese re: changes to his report	0.20
	01/17/08	Call from Adam Reese re: changes to report	0.10
	01/17/08	Emailing Marty Weber to confirm changes to Adam Reese's report	0.10
	01/17/08	Reading email from Marty Weber re: MSJ issues	0.05
	01/17/08	Reading email from Bob Evans re: class members	0.05
	01/20/08	Reading email from Harold Hamilton re: class member Ted House	0.05
	01/21/08	Reading email from Marty Weber re: Catherine Steege report	0.05
	01/21/08	Reading emails from Marty Weber and Karla Jackson re: expert designation	0.10
	01/21/08	Reading email from Marty Weber re: affirmative defenses	0.10
	01/22/08	Reading Catherine Steege's report	0.50
	01/22/08	Reading email from Marty Weber re: ERISA case to be heard by Supreme Court	0.10
	01/22/08	Reading summary judgment motion in United Way case	0.50
	01/22/08	Reading emails from Marty Weber and Karla Jackson re: MSJ and Motion for Class Certification	0.10
	01/24/08	Reading emails from Karla Jackson and Marty Weber re: affirmative defenses	0.15
	01/24/08	Reading email from Marty Weber re: Halliburton	0.10
	01/24/08	Reading Marty Weber's 1/18 email re: Sterling deposition Kerry Notestine	0.10
	01/24/08	Reading Marty Weber's 1/18 email to Adam Reese re: supplemental report	0.10
	01/24/08	Reading Adam Reese's response to Marty Weber's email re: supplemental report	0.10
	01/25/08	Email to Karla Jackson re: MSJ	0.05
	01/25/08	Reading email from Marty Weber re: affirmative defenses	0.10
	01/25/08	Reading draft MSJ	2.50
	01/25/08	Discussing allocation of work with Marty Weber	0.50
	01/25/08	Researching exhaustion of remedies	2.50
	01/25/08	Reading emails from Marty Weber and Nitin Sud re: Rebecca Hyzer deposition	0.10
	01/25/08	Email to Marty Weber re: MSJ response	0.10

**The Roper Firm
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Attorney Time**

Date	Memo	Qty
01/27/08	Reading ALR on exhaustion of administrative remedies	1.10
01/28/08	Working on MSJ response - exhaustion of administrative remedies section	7.50
01/28/08	Reading and responding to email from Marty Weber re: Rebecca Hyzer deposition	0.10
01/29/08	Researching exhaustion and drafting response to affirmative defense	9.00
01/29/08	Call to Marty Weber to discuss arguments	1.00
01/30/08	Researching exhaustion and drafting response to affirmative defense	7.00
01/30/08	Reading email from Marty Weber re: affidavit from class member Ted House	0.10
01/31/08	Drafting portions of MSJ response	10.00
01/31/08	Reading and responding to email from Marty Weber re: ERISA law	0.15
01/31/08	Reading email from Marty Weber re: Adam Reese's report	0.10
01/31/08	Reading emails from Alana Kalantzakis re: caselaw	0.20
02/01/08	Drafting portions of MSJ response	7.00
02/01/08	Reading emails from Marty Weber and Karla Jackson re: MSJ and conference call	0.10
02/01/08	Reading emails from Marty Weber and Catherine Steege re: her report	0.10
02/02/08	Reading email from Bob Evans re: contact info for class member	0.05
02/04/08	Call from Marty Weber to discuss Motion for Class Certification	0.20
02/04/08	Emailing affidavit form to Adam Reese	0.10
02/04/08	Discussing plaintiffs' affidavits with Kathryn Moore	0.20
02/04/08	Proofing affidavits	0.30
02/04/08	Reading emails from Marty Weber and Karla Jackson re: page limitation for MSJ	0.10
02/04/08	Reading email from Marty Weber re: Motion for Class Certification and MSJ	0.10
02/05/08	Reading and making changes to Motion for Class Certification	6.00
02/05/08	Drafting portions of MSJ response	6.50
02/05/08	Reading email from Marty Weber to Kerry Notestine re: page limitations	0.10
02/06/08	Drafting portions of Motion for Class Certification	6.00
02/06/08	Drafting my affidavit	0.50
02/06/08	Drafting Plaintiffs' affidavits	1.50
02/06/08	Reading emails from Kerry Notestine and Marty Weber re: page limitations	0.05
02/06/08	Reading emails from Marty Weber and Karla Jackson re: Plaintiffs' affidavits	0.10
02/07/08	Drafting portions of Motion for Class Certification	5.20
02/07/08	Reading emails from Marty Weber and Kathryn Moore re: attorney affidavit	0.10
02/07/08	Reading and responding to email from Marty Weber re: MSJ footnote	0.10
02/07/08	Reading and responding to email from Marty Weber re: Carol Lanthrip	0.10
02/07/08	Reading and responding to email from Marty Weber re: Shepherd case	0.15
02/08/08	Reading email from Kathryn Moore to Marty Weber re: Harthun declaration	0.05
02/08/08	Reading email from Karla Jackson re: edits to MSJ	0.08
02/13/08	Reading emails from Nitin Sud and Marty Weber re: proposed protective order	0.20
02/13/08	Reading email from Marty Weber re: deposing Wayne Parker	0.05

The Roper Firm
Sterling Chemicals
Attorney Time

	Date	Memo	Qty
	02/14/08	Reading email from Nitin Sud re: Rebecca Hyzer's condition and extension for responses and reading Marty Weber's responses	0.10
	02/15/08	Reading emails from Nitin Sud and Marty Weber re: proposed protective order	0.10
	02/22/08	Reading email from Marty Weber re: Catherine Steege bill	0.05
	02/27/08	Reading email from Marty Weber re: Cytec documents	0.05
	02/28/08	Reading email from Marty Weber to Kerry Notestine re: Hyzer's death	0.10
	02/28/08	Forwarding LaRue opinion to co-counsel and reading their responses	0.10
	02/28/08	Reading Larue v. DeWolff Supreme Court opinion	0.40
	03/03/08	Reading email from Harold Hamilton re: Ted House and travel expenses	0.05
	03/04/08	Reviewing Plaintiffs' expenses	0.20
	03/04/08	Drafting update email to Plaintiffs and attaching MSJ briefing	0.30
	03/05/08	Reading email from Marty Weber re: Sterling board meeting minutes	0.08
	03/10/08	Reading email exchange between Nitin Sud and Marty Weber re: striking of BR expert	0.20
	03/11/08	Email to Marty Weber re: deadline for reply to MSJ	0.05
	03/12/08	Email to co-counsel re: need for conference call re: strategy	0.05
	03/13/08	Researching administrative stay opinion in advance of conference call	1.50
	03/13/08	Talking with Marty Weber re: reply to response to MSJ	0.50
	03/14/08	Conference call with Hal Gillespie, Karla Jackson and Marty Weber re: strategy	0.75
	03/14/08	Reading Defendants' MSJ response	0.50
	03/17/08	Studying Defendants' MSJ response	1.20
	03/17/08	Call from Marty Weber re: issues in MSJ response	0.75
	03/17/08	Conference call to discuss strategy	0.75
	03/17/08	Researching administrative exhaustion for reply	3.50
	03/17/08	Reading email from Marty Weber re: administrative exhaustion case	0.10
	03/18/08	Reading emails from plaintiffs re: conference call	0.08
	03/18/08	Conference call with plaintiffs	1.20
	03/18/08	Reading email from Marty Weber re: question for plaintiffs	0.05
	03/18/08	Reading emails from Marty Weber and Karla Jackson re: Reply to MSJ and Motion to Abate	0.05
	03/18/08	Drafting Sterling MSJ reply	9.50
	03/19/08	Drafting Motion for Stay, Reply to MSJ & Reply to Motion for Class Certification	12.50
	03/19/08	Reading email from Marty Weber re: Replies to Motion for Class Certification and MSJ	0.08
	03/19/08	Reading emails from Karla Jackson and Marty Weber re: Motion to Abate	0.15
	03/19/08	Reading email from Marty Weber re: SOL issue	0.05
	03/19/08	Reading email from Marty Weber re: insert for MSJ reply	0.05
	03/20/08	Reading email from Karla Jackson re: conversation with Nitin Sud re: Motion to Abate	0.05
	03/20/08	Drafting Motion for Stay, Reply to MSJ & Reply to Motion for Class Certification	7.20
	03/24/08	Reading emails from Nitin Sud and Karla Jackson re: opposition to Motion to Abate	0.15
	03/24/08	Reading and responding to email from Karla Jackson re: Response to Motion to Strike	0.08
	03/24/08	Talking with Marty Weber re: strategy	0.20

The Roper Firm
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Attorney Time

	Date	Memo	Qty
	03/25/08	Reading Judge's Order on Stay	0.15
	03/25/08	Emailing co-counsel re: claim for benefits and reading their replies	0.35
	03/25/08	Conference call with Marty Weber & Karla Jackson re: Administrative Claim	0.30
	03/26/08	Drafting claims letter to Sterling	2.50
	03/27/08	Various emails to and from Marty Weber & Karla Jackson re: final draft of claim letter	0.70
	03/27/08	Finalizing claim letter	0.30
	03/28/08	Reading email from Marty Weber re: 2005 SPD	0.05
	04/01/08	Reading emails from Marty Weber re: SEC filings	0.10
	04/01/08	Call from Marty Weber re: strategy re: potential settlement and how to handle if not certified	0.50
	04/08/08	Reading email from Nitin Sud re: Motion for Reconsideration	0.05
	04/09/08	Reading email from Marty Weber re: Motion for Reconsideration	0.05
	04/15/08	Reading email from Marty Weber re: Catherine Steege invoice	0.05
	04/15/08	Reading email from Marty Weber re: deadline for appeal	0.05
	04/16/08	Reviewing proposed letter to Kerry Notestine re: mediation and forwarding to Hal Gillespie	0.30
	04/17/08	Reading emails from Marty Weber and Hal Gillespie re: letter to Kerry Notestine	0.10
	04/21/08	Reviewing email from Marty Weber re: call from Kerry Notestine	0.10
	04/21/08	Reviewing letter from Kerry Notestine to benefits committee	0.20
	04/21/08	Emailing Marty Weber proposal changes to respond to Kerry Notestine	0.10
	04/21/08	Call from Marty Weber to discuss proposal changes to respond to Kerry Notestine	0.35
	04/22/08	Reading emails from Marty Weber and Kerry Notestine re: summary statement to plan administrator	0.10
	04/23/08	Reading emails from Marty Weber and Hal Gillespie re: response to Kerry Notestine	0.10
	04/24/08	Reading and responding to emails from co-counsel and Kerry Notestine re: mediation	0.10
	04/25/08	Reading email from Kerry Notestine re: requests of plan administrator	0.05
	04/25/08	Reading emails to and from co-counsel re: mediators	0.10
	04/29/08	Call to Christopher Nolland re: availability	0.20
	04/29/08	Email to Kerry Notestine re: Christopher Nolland	0.08
	05/01/08	Reading email from Kerry Notestine re: potential mediators	0.10
	05/02/08	Looking for mediators on internet	1.10
	05/02/08	Call to Hal Gillespie to discuss mediators proposed by Defendants	0.40
	05/05/08	Call from Marty Weber to discuss mediation	0.35
	05/05/08	Composing email to Marty Weber re: McGowan	0.10
	05/05/08	Call to McGowan's office to check availability	0.20
	05/07/08	Email to co-counsel re: status of potential mediators	0.05
	05/07/08	Reading emails from Hal Gillespie and Marty Weber re: letter to Notestine	0.10
	05/07/08	Call from Joe Cox re: mediation	0.20
	05/08/08	Call to Ira Jaffee	0.25
	05/08/08	Email to Kerry Notestine re: mediation and editing proposed letter to Cytec	0.20
	05/14/08	Emails to and from Kerry Notestine re: mediation date	0.25
	05/14/08	Email and call to Ira Jaffee	0.25

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	Date	Memo	Qty
	05/16/08	Reading emails from Kerry Notestine and Jeff Koenig, counsel for Cytec	0.10
	05/21/08	Reviewing Adam Reese bill and forwarding to co-counsel with comments	0.50
	05/22/08	Reading emails from Ira Jaffe and Kerry Notestine re: mediation arrangements	0.15
	05/22/08	Reading email from Marty Weber re: conversation with Kerry Notestine	0.05
	05/26/08	Reading emails from Jeff Koenig and Kerry Notestine re: response to requests	0.10
	05/27/08	Conference call with Marty Weber and Karla Jackson re: mediation	0.75
	05/27/08	Reading email and confidentiality agreement from Ira Jaffee	0.50
	05/27/08	Reading email from Bob Evans re: travel arrangements for mediation	0.05
	05/27/08	Reading email from Marty Weber to Kerry Notestine re: questions prior to mediation	0.05
	05/27/08	Reading emails from Karla Jackson and Marty Weber re: materials to send to Ira Jaffee	0.08
	05/27/08	Reading email from Kerry Notestine re: email from Jeff Koenig at Cytec	0.08
	05/27/08	Reading emails from Karla Jackson and Marty Weber re: start time for mediation	0.10
	05/27/08	Reading email from Marty Weber re: damages model for mediation	0.10
	05/27/08	Reading email from Ira Jaffee re: his travel plans for mediation	0.05
	05/28/08	Reading emails from Karla Jackson and Marty Weber re: mediation confidentiality agreement	0.20
	05/28/08	Email to co-counsel re: check for Ira Jaffee	0.05
	05/28/08	Conference call with Marty Weber, Hal Gillespie & Karla Jackson to discuss mechanics of settlement	0.50
	05/28/08	Reviewing MSJ Briefing and other documents in preparation for mediation	3.20
	05/28/08	Making hotel and flight reservations for mediation in Houston	0.25
	05/28/08	Reading emails from Bob Evans re: payments to Sterling	0.15
	05/28/08	Reading email from Marty Weber re: damage calculations for named plaintiffs	0.12
	05/29/08	Reading emails from co-counsel with their travel reservations for mediation in Houston	0.05
	05/29/08	Reading emails from Marty Weber and Karla Jackson re: letter to Ira Jaffee	0.10
	05/29/08	Reading email from Nitin Sud re: new document production	0.05
	05/29/08	Reading email from Bob Evans re: conference call and his travel plans	0.05
	05/30/08	Preparing for mediation and drafting letter to Ira Jaffee	7.00
	05/30/08	Transmitting letter and Haliburton opinion to Ira Jaffee	0.20
	05/30/08	Conference call with Marty Weber and Bob Evans re: mediation prep	1.00
	05/30/08	Reading emails from Karla Jackson and Hal Gillespie re: check for mediation	0.10
	05/30/08	Reading email from Ira Jaffee re: his travel plans for mediation	0.05
	05/30/08	Reading email from Marty Weber to Kerry Notestine re: elements for settlement	0.10
	05/31/08	Preparing for Sterling mediation	5.00
	06/01/08	Preparing for Sterling mediation	5.00
	06/02/08	Flying to Houston and participating in mediation	14.00
	06/03/08	Reading emails from Bob Evans and Marty Weber re: mediation outcome	0.20
	06/03/08	Reading emails from Ira Jaffee and Karla Jackson and Hal Gillespie re: mediation fee	0.10
	06/04/08	Reviewing Sterling plan and call to Marty Weber	0.20
	06/06/08	Reading emails from co-counsel re: Sterling's denial of claim letter	0.15
	06/06/08	Call to Marty Weber and email to Plaintiffs counsel	0.20

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Attorney Time**

	Date	Memo	Qty
	06/06/08	Finalizing appeal letter	0.20
	06/06/08	Reviewing draft letter to clients and emailing proposed revision	0.30
	06/09/08	Reading email from Marty Weber to named plaintiffs re: mediation outcome	0.10
	06/11/08	Conference call re: settlement strategy	0.75
	06/13/08	Emailing with co-counsel re: conference call and Hal's plan to call Kerry Notestine	0.10
	06/16/08	Conference call re: Hal Gillespie's conversation with Kerry Notestine	1.00
	06/17/08	Sending out Adam Reese outline for payment	0.20
	06/19/08	Reading MetLife v. Glenn and emails from Karla Jackson and Marty Weber	0.25
	06/23/08	Emailing with co-counsel re: Sterling benefits committee presentation	0.10
	06/26/08	Sending confirmation email to Hal Gillespie re: 07/29	0.20
	07/01/08	Talking to Marty Weber re: benefits presentation	0.50
	07/18/08	Working on Sterling benefits committee presentation	4.00
	07/20/08	Working on Sterling benefits committee presentation	9.00
	07/21/08	Working on Sterling benefits committee presentation	3.00
	07/21/08	Reading email from Marty Weber to Nitin Sud re: class size, and Nitin Sud's response	0.15
	07/22/08	Working on Sterling presentation and sending to co-counsel	3.00
	07/22/08	Making flight reservation for travel to Houston for Sterling benefits committee meeting	0.15
	07/25/08	Call to Bob Evans re: Benefits Committee Meeting	0.50
	07/27/08	Reading emails from Bob Evans re: GM case and settlement elements	0.20
	07/28/08	Flying to Houston for Sterling Benefits Committee meeting	2.30
	07/28/08	Reading emails from Hal Gillespie re: travel plans for Houston	0.10
	07/28/08	Preparation for Sterling Benefits Committee meeting	7.70
	07/29/08	Participating in Sterling Benefits Committee meeting	4.80
	07/29/08	Returning to Dallas	2.20
	07/30/08	Reading email from Marty Weber to Bob Evans re: outcome of benefits committee presentation	0.20
	07/30/08	Reading emails from Marty Weber and Hal Gillespie re: call to Kerry Notestine	0.10
	07/31/08	Reading email from Kerry Notestine re: counter offer	0.05
	08/05/08	Reading email from Bob Evans re: plan rates and coverage	0.10
	08/12/08	Emailing co-counsel re: denial of appeal from Sterling	0.20
	08/13/08	Reading emails from Kerry Notestine and co-counsel re: counter offer	0.15
	08/19/08	Reading email from Kerry Notestine re: lifting stay	0.10
	08/21/08	Reading emails from Marty Weber and Kerry Notestine re: Motion to Lift Stay	0.10
	08/22/08	Reading email from Marty Weber re: taking depositions	0.10
	08/27/08	Reviewing Agreed Motion to Lift Stay	0.10
	08/28/08	Reading emails from Harold Hamilton and Bob Evans and Marty Weber's re: update on case	0.15
	08/28/08	Reading email from Kerry Notestine re: potential mediator	0.10
	08/28/08	Reading email from Marty Weber re: his conversation with Kerry Notestine	0.10
	08/28/08	Attending Status Conference by telephone	0.50
	08/28/08	Reading emails from co-counsel re: mediator Eric Galton and dates for mediation	0.15

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	Date	Memo	Qty
	08/29/08	Reading emails from Kerry Notestine and co-counsel re: dates for mediation	0.10
	09/03/08	Reading emails from Kerry Notestine and co-counsel re: dates for mediation	0.10
	09/04/08	Reading emails from Marty Weber and Kerry Notestine re: mediation scheduled	0.10
	09/05/08	Reviewing Marty Weber's proposed supplemental briefing in Sterling and responding by email	0.25
	09/05/08	Talking to Marty Weber re: Sterling mediation	0.25
	09/08/08	Composing email re: mediation to Bob Evans	0.30
	09/11/08	Talking to Marty Weber re: to do items for mediation	0.30
	09/11/08	Searching for benefits denial letter dated 04/30/08 and emailing it to Marty Weber	0.50
	09/18/08	Reading email from Kerry Notestine re: rescheduling mediation	0.05
	09/19/08	Reading email from Kathryn Moore re: new mediation dates for Eric Galton	0.05
	09/22/08	Email to Bob Evans re: rescheduling mediation and reading his response	0.10
	09/23/08	Reading emails from Kathryn Moore and Hal Gillespie re: new mediation dates	0.10
	09/30/08	Reading emails from Marty Weber to Christa Boyd re: response briefing	0.10
	10/01/08	Researching deference standard for MSJ response	3.00
	10/01/08	Reading email from Marty Weber re: outline for MSJ response	0.10
	10/01/08	Conference call with co-counsel re: case strategy	1.00
	10/03/08	Reading emails from Christa Boyd and Marty Weber re: extension for response to MSJ	0.10
	10/06/08	Reading emails from Marty Weber and Kerry Notestine re: rescheduling mediation	0.10
	10/07/08	Call to Eric Galton to check availability and email to co-counsel	0.30
	10/07/08	Email to Kerry Notestine and to client	0.20
	10/10/08	Reading letter from Kerry Notestine	0.10
	10/13/08	Reading proposed letter from Marty Weber to Kerry Notestine and emailing comments to Marty Weber	0.50
	10/14/08	Reading email from Marty Weber re: looking at complaint	0.10
	10/14/08	Reviewing complaint	0.50
	10/14/08	Call to Marty Weber re: briefing for MSJ	0.30
	10/14/08	Call to Marty Weber and Catherine Steege	0.30
	10/14/08	Call to Marty Weber re: need to amend complaint and conferencing Hal Gillespie in	0.40
	10/15/08	Drafting and revising Fourth Amended Complaint and briefing on Motion to Amend	3.00
	10/15/08	Drafting and revising Motion to Amend and MSJ Response	6.00
	10/16/08	Reading email from Bob Evans re:available dates for mediation	0.05
	10/16/08	Reading emails from Christa Boyd and Marty Weber re: response to MSJ	0.10
	10/16/08	Emailing Fourth Amended Complaint to Kerry Notestine and reading his response	0.15
	10/17/08	Emailing Marty Weber re: vesting portion of MSJ Response	0.10
	10/17/08	Reading email from Kerry Notestine re: Motion to Amend	0.10
	10/18/08	Drafting and revising vesting portion of MSJ Response	5.00
	10/20/08	Reading email from Bob Evans re: next mediation	0.05
	10/20/08	Drafting MSJ Response	3.50
	10/20/08	Reading emails from Marty Weber and Cynthia Gillespie re: filing of response	0.10

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	Date	Memo	Qty
	10/21/08	Reading emails from Kerry Notestine and co-counsel re: Defendants' motion to amend	0.10
	10/22/08	Talking to Marty Weber re: Defendants' motion for leave to file counterclaim	0.30
	10/22/08	Reading email from Marty Weber to Kerry Notestine re: Defendants' motion for leave to file counterclaim	0.10
	10/22/08	Reading emails from court clerk and response from Marty Weber	0.10
	10/22/08	Reading Sterling draft motion and counterclaim	0.50
	10/23/08	Drafting email to Plaintiffs re: status	0.50
	11/03/08	Reading Sterling's reply brief	0.75
	10/06/08	Reading emails from Bob Evans and Marty Weber re: Steling's SEC filings	0.10
	11/07/08	Reading emails from Kerry Notestine, Marty Weber, and Ken Hale re: Defendants' Motion for Leave to Amend	0.15
	11/10/08	Reviewing Plaintiffs' Motion to Amend	0.30
	11/16/08	Reading emails from Bob Evans and Harold Hamilton re: status update	0.05
	11/18/08	Call to Marty Weber re:scheduling of conference call	0.20
	11/18/08	Emailing with co-counsel and named plaintiffs re: scheduling of conference call	0.10
	11/19/08	Call from Marty Weber re: granting of Class Certification motion	0.30
	11/24/08	Reading Court's order on Class Certification in Sterling case	0.25
	11/24/08	Reading email from Bob Evans re: Kenneth Hale	0.10
	11/24/08	Reading faxed plan info from Harold Hamilton	0.10
	11/24/08	Call to Harold Hamilton to tell him about conference call numbers	0.10
	11/24/08	Reading Reuters report re: Sterling emailed by Bob Evans	0.10
	11/24/08	Reading email from Nitin Sud re: taking depo of Cytec representative	0.10
	11/24/08	Conference call with Plaintiffs re: status	1.00
	11/24/08	Reading emails from Bob Evans re: enrollment for Sterling plan	0.10
	12/01/08	Reading email from Nitin Sud re: extension for Answer	0.05
	12/01/08	Reading email from Adam Reese re: invoice and forwarding to Marty Weber	0.05
	12/03/08	Reading emails from Nitin Sud and Marty Weber re: Cytec corporate representative depositions	0.10
	12/03/08	Emailing Adam Reese re: invoice	0.05
	12/09/08	Call to Nitin Sud re: scheduling of Cytec corporate representative depositions	0.20
	12/10/08	Emailing with Nitin Sud and Marty Weber re: scheduling of Cyte corporate representative depositions	0.10
	12/22/08	Reading email from Bob Evans re: summary judgement	0.10
	01/06/09	Reading email from Bob Evans re: expense reimbursement	0.05
	01/15/09	Booking flight to NYC	0.25
	01/21/09	Reading emails from Marty Weber and Adam Reese's office re: invoice	0.10
	01/26/09	Reading and responding to email from Sara Stevens re: additional expert designation deadline	0.10
	01/26/09	Call from Marty Weber re: Sterling corporate representative deposition strategy	0.75
	02/04/09	Reading email from Marty Weber re: ruling on MSJ	0.05
	02/06/09	Gathering stuff to take to NYC for Cytec corporate representative deposition	1.00
	02/06/09	Flying to NYC and reading briefing in preparation for Cytec corporate representative deposition	9.50

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	Date	Memo	Qty
	02/08/09	Reviewing documents for Cytec corporate representative deposition	3.00
	02/08/09	Going to Kinko's to copy documents for Cytec corporate representative deposition	0.50
	02/09/09	Picking up documents from Kinko's	0.50
	02/09/09	Renting car and driving to New Jersey for Cytec corporate representative deposition	3.50
	02/09/09	Cytec corporate representative deposition	6.00
	02/09/09	Driving back to NYC	3.00
	02/10/09	Flying back to Dallas from NYC from Cytec corporate representative deposition	7.00
	02/11/09	Calling Marty Weber re: Cytec corporate representative deposition and needed discovery	0.75
	02/11/09	Emailing Jeff Koenig re: spreadsheets from Carol Van Rensalier	0.10
	02/12/09	Emailing PDFs of exhibits to Marty Weber and responding to email re: need for affidavit	0.50
	02/16/09	Reading email from Jeff Koenig re: spreadsheets from Carol Van Rensalier and forwarding to counsel	0.10
	03/06/09	Reading and responding to email from Sara Stevens re: e-transcript of deposition of Carol Van Rensalier	0.10
	03/09/09	Reading emails from Bob Evans and Marty Weber re: ruling on MSJ	0.15
	03/10/09	Reading emails from Marty Weber and Nitin Sud re: rescheduling mediation	0.10
	03/19/09	Call to Marty Weber re: proposed mediation dates	0.30
	03/19/09	Looking through MSJ to come up with list of Sterling people to depose and emailing to co-counsel	1.00
	03/19/09	Emailing Bob Evans re: mediation	0.20
	03/20/09	Reading emails from Nitin Sud and Marty Weber re: persons to depose	0.10
	03/23/09	Reading Bob Evans's email re: mediation and responding	0.20
	03/24/09	Reading emails from Marty Weber and Nitin Sud re: mediation and deposition dates	0.10
	03/24/09	Reading email from Marty Weber re: breach of fiduciary duty claim	0.05
	03/27/09	Emailing with co-counsel and opposing counsel re: mediation dates	0.25
	03/28/09	Reading email from Bob Evans re: availability for mediation	0.05
	04/01/09	Scheduling depositions	0.25
	04/01/09	Talking with Marty Weber re: persons to depose	0.25
	04/01/09	Drafting deposition notices	0.25
	04/01/09	Reading emails from Marty Weber and Nitin Sud re: mediation	0.10
	04/02/09	Editing letter to Defendants re: depositions	0.25
	04/02/09	Reading and responding to email from Sara Stevens re: deposition dates	0.05
	04/03/09	Email to clients re: MSJ review	0.20
	04/06/09	Talking to Marty Weber re: Sterling	0.75
	04/07/09	Call to Hal Gillespie re: Sterling strategy	0.40
	04/07/09	Call to Cindy Weatherford re: her deposition	0.50
	04/07/09	Call to Paul Vanderhoven re: scheduling his deposition	0.10
	04/07/09	Emailing with Marty Weber re: declarations from potential deponents	0.10
	04/07/09	Reading emails from Bob Evans re: Sterling employees	0.10
	04/08/09	Call from Paul Vanderhoven re: scheduling his deposition	0.30
	04/08/09	Email to Defense counsel re: deposition dates	0.20

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	Date	Memo	Qty
	04/08/09	Call to Marty Weber re: scheduling depositions	0.20
	04/08/09	Email to Hal Gillespie re: getting Christa Boyd's help	0.20
	04/08/09	Responding to Nitin Sud's email re: depositions	0.10
	04/08/09	Working on Cast of Characters grid for Sterling	0.40
	04/08/09	Call from Kerry Notestine re: status of mediation	0.40
	04/08/09	Calls to and from Marty Weber and Hal Gillespie re: strategy for case and scheduling of depos	1.00
	04/08/09	Working on Cast of Characters	2.00
	04/08/09	Call from Paul Vanderhoven	0.50
	04/09/09	Conference call with Marty Weber and Christa Boyd re: strategy for deposition	1.00
	04/09/09	Editing Cast of Characters grid	1.50
	04/09/09	Emailing with co-counsel and opposing counsel re: scheduling of depositions	0.20
	04/09/09	Email to Christa Boyd re: breach of fiduciary duty claim	0.10
	04/10/09	Conference call with co-counsel re: depositions	0.20
	04/13/09	Emailing with co-counsel and opposing counsel re: scheduling of depositions	0.10
	04/14/09	Editing of deposition notices and Subpoena Duces Tecum and scheduling depositions of Richard Crump, Kenneth Hale, Paul Vanderhoven, and Cindy Weatherford	1.50
	04/15/09	Email to John Scialdone re: process server in Florida	0.20
	04/15/09	Reading and responding to emails from Sara Stevens re: process server in Florida and length of time for Cindy Weatherford deposition	0.10
	04/16/09	Reading emails from Bob Evans and Sara Stevens re: Cindy Weatherford deposition	0.10
	04/16/09	Reading and responding to email from Marty Weber re: deposition outline	0.10
	04/17/09	Reading emails from Sara Stevens re: Florida process server and location for Robert McAlister deposition	0.10
	04/20/09	Reading email from Christa Boyd re: research on breach of fiduciary duty	0.05
	04/20/09	Westlaw research on breach of fiduciary duty	0.50
	04/22/09	Meeting with Marty Weber and Christa Boyd for deposition preparation	6.50
	04/24/09	Email to Nitin Sud and Kerry Notestine re: several issues	0.30
	04/24/09	Working on Deposition Exhibit Grid and emailing to co-counsel	0.10
	04/27/09	Reading emails from Marty Weber and Sara Stevens re: Robert McAlister deposition	0.10
	04/27/09	Reading and responding to email from Sara Stevens re: Bates labeling documents	0.05
	04/27/09	Going through Exhibits for depositions	1.50
	04/28/09	Reading Bob Evans's email from 4/19	0.10
	04/28/09	Call to Marty Weber re: depositions	0.30
	04/28/09	Preparing for Cindy Weatherford deposition and creating deposition outline	5.00
	04/28/09	Reading email from Marty Weber re: deposition exhibits	0.05
	04/28/09	Reading email from Sara Stevens re: Robert McAlister and Paul Vanderhoven depositions	0.10
	04/29/09	Reading and responding to emails from Bob Evans re: Cindy Weatherford deposition	0.10
	04/29/09	Reading and responding to email from Nitin Sud re: length of Cindy Weatherford deposition	0.10
	04/29/09	Preparing for deposition of Cindy Weatherford and creating deposition outline	10.00
	04/29/09	Reading email from Marty Weber re: Paul Vanderhoven deposition	0.10

**The Roper Firm
Sterling Chemicals
Attorney Time**

	Date	Memo	Qty
	04/30/09	Traveling to Florida and back for Cindy Weatherford deposition	14.00
	05/02/09	Call from Marty Weber re: Kenneth Hale's deposition	0.10
	05/02/09	Call to Jeff Koenig re: deposition of Roy Smith	0.50
	05/02/09	Email to co-counsel re: call to Jeff Koenig and deposition of Roy Smith	0.25
	05/04/09	Reading emails from Nitin Sud and Marty Weber re: Kenneth Hale's deposition	0.10
	05/05/09	Reading email from Kerry Notestine re: Kenneth Hale depo topics	0.05
	05/05/09	Emailing with Christa Boyd re: status of breach of fiduciary duty research	0.08
	05/05/09	Call from Marty Weber to tell me about Kenneth Hale's deposition	0.30
	05/06/09	Call from Marty Weber re: potential letter to Sterling counsel	0.10
	05/06/09	Email to Sara Stevens re: Rough Ascii of Kenneth Hale deposition	0.10
	05/06/09	Call and email to Jeff Koenig to follow up re: Roy Smith deposition	0.10
	05/06/09	Email to Nitin Sud re: bifurcation	0.10
	05/06/09	Call to Christa Boyd re: exhibits issue	0.10
	05/06/09	Responding to Christa Boyd's email and attaching exhibits	0.30
	05/06/09	Reading Nitin Sud's email re: David Elkins' deposition and Marty Weber's response	0.10
	05/07/09	Reading and responding to emails re: Robert McAlister subpoena	0.10
	05/08/09	Reading and responding to email from Christa Boyd re: Robert McAlister deposition	0.10
	05/11/09	Reading emails from Marty Weber and Christ Boyd re: who is taking Robert McAlister deposition	0.10
	05/11/09	Preparing for Robert McAlister deposition	2.00
	05/12/09	Reading Kenneth Hale's deposition	2.00
	05/12/09	Driving to Hamilton, Texas from Dallas, Texas	2.50
	05/12/09	Deposing Robert McAlister	4.00
	05/12/09	Driving back from Hamilton, Texas to Dallas, Texas	2.50
	05/13/09	Call to Jeff Koenig re: deposition of Roy Smith	0.10
	05/13/09	Call to Marty Weber re: deposition of Roy Smith	0.15
	05/13/09	Reading emails from Nitin Sud and Marty Weber re: Motion to Bifurcate	0.10
	05/15/09	Call from Marty Weber re: strategy; whether to depose Roy Smith	0.50
	05/18/09	Reading Marty Weber's edits to Motion to Bifurcate and responding to his email	0.10
	05/19/09	Reading email from Harold Hamilton re: Cindy Weatherford deposition and forwarding to Sara Stevens	0.10
	05/19/09	Reading email from Nitin Sud re: Byron Haney availability for deposition	0.10
	05/19/09	Reading email from Nitin Sud re: Marty Weber's changes to Motion to Bifurcate	0.05
	05/20/09	Call to Frank Diassi with Marty Weber	0.10
	05/20/09	Working on outline for research on Breach of Fiduciary Duty	2.50
	05/20/09	Reading email from Marty Weber re: Byron Haney deposition	0.10
	05/20/09	Emailing memo on Breach of Fiduciary Duty to Marty Weber	0.05
	05/20/09	Reading email from Marty Weber re: breach of fiduciary duty claim	0.15
	05/20/09	Reading emails from Marty Weber and Kerry Notestine re: David Elkin deposition	0.10
	05/20/09	Talking with Marty Weber re: issues for Breach of Fiduciary Duty	0.50

**The Roper Firm
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	Date	Memo	Qty
	05/20/09	Email to Christa Boyd re: research that needs to be done on Breach of Fiduciary Duty	0.10
	05/20/09	Reading email from Nitin Sud re: David Elkin's availability	0.05
	05/21/09	Reading emails from Nitin Sud and Marty Weber re: additional corporate representative depositions	0.10
	05/21/09	Reading email from Marty Weber re: new Sterling argument	0.10
	05/21/09	Reading emails from Marty Weber and Nitin Sud re: scheduling of Byron Haney and David Elkins depositions	0.10
	05/22/09	Reading and responding to email from Marty Weber re: amended deposition notice for Byron Haney	0.10
	05/22/09	Reading email from Christa Boyd re: research on breach of fiduciary duty	0.10
	05/23/09	Reading email from Marty Weber re: Frank Diassi deposition	0.05
	05/26/09	Call from Marty Weber re: supplementing discovery and extension	0.20
	05/26/09	Reviewing David Elkins Deposition Notice and subpoena	0.10
	05/26/09	Reading Marty Weber's email re: expert testimony on breach of fiduciary duty claim and Christa Boyd's research and responding to both	0.20
	05/26/09	Talking with Sara Stevens re: whether to subpoena David Elkins	0.10
	05/26/09	Reading Weber emails re: depo extension agreement	0.10
	06/02/09	Reading emails from Nitin Sud and Marty Weber re: scheduling of Marcia Nieder deposition	0.10
	06/03/09	Email to Sara Stevens re: new discovery deadlines	0.05
	06/03/09	Email to Hal Gillespie re: Christa Boyd's research on breach of fiduciary duty	0.05
	06/03/09	Email to Nitin Sud re: extension and responding to Nitin Sud on producing documents during Cindy Weatherford deposition	0.08333
	06/08/09	Reviewing Christa Boyd's memo	0.18333
	06/08/09	Reading email from Marty Weber	0.18333
	06/08/09	Call to Marty Weber to discuss breach of fiduciary duty	0.50
	06/08/09	Researching causes of action for breach of fiduciary duty and working on motion for certification	1.00
	06/08/09	Conference call with Hal Gillespie	0.50
	06/09/09	Reading email from Marty Weber re: breach of fiduciary duty claim outline	0.10
	06/09/09	Working on motion for class certification	4.56667
	06/09/09	Emailing Marty Weber re: documents for production from Bob Evans and Harold Hamilton	0.16667
	06/10/09	Reading email from Marty Weber and researching Marty Weber's question re: supplementation of expert reports	1.00
	06/10/09	Emailing Marty Weber re: class certification issues	0.16667
	06/10/09	Working on Motion for Certification	1.26667
	06/10/09	Reading emails from Marty Weber and Sara Stevens re: documents from Bob Evans and Harold Hamilton	0.05
	06/10/09	Reading emails from Marty Weber and Kerry Notestine re: deadlines	0.06667
	06/10/09	Reading emails from Marty Weber and Sara Stevens re: Paul Vanderhoven deposition transcript	0.05
	06/10/09	Reading and responding to email from Marty Weber re: supplemental discovery responses	0.08333
	06/11/09	Reading emails from Marty Weber and Nitin Sud re: deposition topics	0.05
	06/11/09	Researching and drafting Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	5.55
	06/12/09	Emailing Baker case to Marty Weber and Hal Gillespie	0.06667
	06/12/09	Working on Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	3.60
	06/15/09	Working on Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	6.65

**The Roper Firm
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Attorney Time**

	Date	Memo	Qty
	06/16/09	Working on Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	5.65
	06/17/09	Working on Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	2.58333
	06/17/09	Reading email from Sara Stevens re: premium payments for Dennis Harthun	0.05
	06/17/09	Reading email from Marty Weber with his proposed response to Sterling letter	0.10
	06/18/09	Working on Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	5.25
	06/19/09	Working on Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	7.88333
	06/22/09	Looking over Westcheck results for Motion/Memorandum	9.73333
	06/22/09	Call to Marty Weber to discuss Westcheck results for Motion/Memorandum	0.50
	06/23/09	Editing Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	5.60
	06/23/09	Call to David Jones re: appendix issues	0.50
	06/23/09	Call to Marty Weber re: exhibits & appendix	0.50
	06/24/09	Checking cites for Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	0.50
	06/24/09	Call to Court	0.25
	06/24/09	Reading email from Marty Weber re: his conversation with Kerry Notestine	0.08333
	06/25/09	Discussing class certification brief changes and filing with Marty Weber	0.33333
	06/25/09	Strategizing on upcoming deposition	0.41667
	06/25/09	Emails re: scheduling strategy meeting	0.16667
	07/01/09	Call to Hal Gillespie re: Sterling expert issue	0.10
	07/01/09	Reading Sterling expert briefing	0.25
	07/01/09	Reading email from Marty Weber	0.10
	07/06/09	Emailing with co-counsel re: strategy meeting	0.05
	07/07/09	Conference call with Hal Gillespie and Marty Weber re: expert witness	1.66667
	07/07/09	Drafting letter to Kerry Notestine	0.50
	07/07/09	Reading emails from Christa Boyd and Marty Weber re: Catherine Steege declaration	0.10
	07/07/09	Reading email from Marty Weber to Kerry Notestine re: motion to exclude expert testimony	0.08333
	07/08/09	Email to Sara Stevens re: cast of characters grid	0.05
	07/08/09	Strategy Meeting at Hal Gillespie's office	4.00
	07/08/09	Drafting response to motion to strike expert	2.00
	07/08/09	Reading email from Christa Boyd re: to-do list	0.06667
	07/09/09	Reading emails from Marty Weber and Christa Boyd re: Wapakoneta briefing	0.08333
	07/09/09	Editing letter to Kerry Notestine re: opposing certification	0.33333
	07/09/09	Emailing case update to named plaintiffs	0.15
	07/10/09	Reading email from Marty Weber re: MSJ issue	0.05
	07/13/09	Responding to Bob Evans email	0.25
	07/13/09	Call to Marty Weber to discuss response to MSJ	0.66666
	07/13/09	Researching case law for MSJ response	3.00
	07/14/09	Email to plaintiffs to schedule phone conference	0.20
	07/14/09	Phone conference with Plaintiffs	0.75
	07/14/09	Working on MSJ response	4.68333
	07/15/09	Reading Marty Weber's draft response to Partial MSJ and editing	1.00
	07/15/09	Reading Defendants' response to Motion to Certify Breach of Fiduciary Duty claims	0.25

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	Date	Memo	Qty
	07/15/09	Reading letter from Kerry Notestine re: opposition to Breach of Fiduciary Duty claim	0.10
	07/15/09	Call to Marty Weber to discuss letter and response to Breach of Fiduciary Duty claim	0.56667
	07/16/09	Reading emails from Marty Weber and Christa Boyd re: response to MSJ	0.05
	07/16/09	Researching and drafting Reply to Defendants' Response to Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	2.63333
	07/17/09	Call to Marty Weber to discuss MSJ response	0.50
	07/17/09	Editing MSJ response	0.75
	07/17/09	Email to Marty Weber with changes to MSJ response	0.15
	07/17/09	Reviewing Hal Gillespie's settlement letter	0.20
	07/20/09	Researching and drafting Reply to Defendants' Response to Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	5.80
	07/21/09	Researching and drafting Reply to Defendants' Response to Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	7.73333
	07/22/09	Reading emails from Marty Weber and Nitin Sud re: Joint Pretrial Order	0.05
	07/22/09	Researching and drafting Reply to Defendants' Response to Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	7.56667
	07/23/09	Researching and drafting Reply to Defendants' Response to Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	5.80
	07/24/09	Reading email from Marty Weber re: Joint Pretrial Order	0.05
	07/27/09	Researching and drafting Reply to Defendants' Response to Motion for Class Certification of Breach of Fiduciary Duty Claims and Memorandum in Support	0.41667
	07/28/09	Getting time records ready for expert Rex Burch	0.75
	07/29/09	Reading and responding to email from Marty Weber re: hourly rates	0.08333
	08/05/09	Conference call with Marty Weber and Catherine Steege re: supplemental report	0.50
	08/11/09	Reading email from Diana Richard at Hal Gillespie's office re: deposition transcripts and forwarding to Sara Stevens	0.05
	08/07/09	Call to Melinda Barnes at Marty Weber's office re: filing of Catherine Steege's supplemental report	0.21667
	08/07/09	Reading Catherine Steege's supplemental report	0.25
	08/12/09	Emailing with co-counsel re: pretrial dates	0.15
	08/13/09	Emailing with co-counsel re: bifurcation and trial preparation	0.15
	08/13/09	Call from Marty Weber re: tomorrow's deadlines	0.25
	08/13/09	Call to Kerry Notestine regarding deadlines	0.25
	08/13/09	Reviewing Judge Hoyt's rules	0.16667
	08/13/09	Composing email to Kerry Notestine with Agreement	0.25
	08/14/09	Sending email to Marty Weber re: expert supplementation	1.08333
	08/14/09	Drafting Findings of Fact and Conclusions of Law	1.55
	08/17/09	Reading email from Marty Weber re: AIG adjustor	0.50
	08/17/09	Drafting Findings of Fact and Conclusions of Law	2.58333
	08/18/09	Drafting Findings of Fact and Conclusions of Law	2.08333
	08/19/09	Drafting Findings of Fact and Conclusions of Law	0.38333
	08/20/09	Emailing Sara Stevens details to fill in on Findings of Fact and Conclusions of Law	0.08333
	08/20/09	Drafting Findings of Fact and Conclusions of Law	4.00
	08/21/09	Emailing Melinda Barnes at Crowley Norman re: Catherine Steege report	0.05
	08/21/09	Drafting Findings of Fact and Conclusions of Law	0.51667
	08/22/09	Drafting Findings of Fact and Conclusions of Law	2.08333
	08/24/09	Talking with Marty Weber re: strategy	0.45
	08/24/09	Emailing Findings of Fact and Conclusions of Law to Marty Weber	0.05

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Attorney Time**

	Date	Memo	Qty
	08/24/09	Emailing with co-counsel re: scheduling conference call	0.10
	08/26/09	Reading Defendants' Supplemental Privilege Log, Fourth Supplemental Disclosures, Third Supplemental Responses to Plaintiffs' First Set of RFPs, and Defendants' Fifth Supplemental Disclosures	0.25
	08/26/09	Reviewing memo re: trial prep	0.08333
	08/26/09	Reviewing supplemental report of Defendants' attorneys' fee expert	0.11667
	08/26/09	Call to Marty Weber to discuss pretrial tasks	0.25
	08/27/09	Designating and highlighting Cindy Weatherford deposition cuts	0.76667
	08/27/09	Reading email from Bob Evans	0.10
	08/27/09	Call to Marty Weber and Christa Boyd re: conference call	0.16667
	08/27/09	Emailing co-counsel re: time for conference call	0.16667
	08/28/09	Reading email from Marty Weber re: mediation settlement offers	0.05
	08/28/09	Conference call re: pretrial; reviewing witness list	1.71667
	09/02/09	Call to Marty Weber re: pretrial tasks	0.33333
	09/02/09	Call to Hal Gillespie re: demand to Defendants	0.33333
	09/02/09	Reading email from Christa Boyd and responding	0.16667
	09/02/09	Reading Robert McAlister deposition and doing deposition cuts	1.16667
	09/02/09	Reading emails re: pretrial sent over last several days	0.25
	09/03/09	Reading emails over last several days re: case	0.11667
	09/03/09	Call to Marty Weber re: pretrial	0.25
	09/03/09	Talking with Sara Stevens re: exhibit	0.33333
	09/03/09	Working on Findings of Fact and Conclusions of Law	4.16667
	09/04/09	Emailing with co-counsel re: pretrial work to be done	0.25
	09/04/09	Working on pretrial filings	7.00
	09/05/09	Reading emails from Bob Evans re: Pretrial filings	0.10
	09/07/09	Reading emails from Marty Weber and Bob Evans re: Cytec pricing	0.10
	09/07/09	Reading emails from Kerry Notestine and Hal Gillespie re: settlement offer	0.10
	09/08/09	Call to Marty Weber re: trial strategy and witness schedule	0.75
	09/08/09	Working on task list	2.63333
	09/08/09	Call to Hal Gillespie re: pretrial	0.50
	09/08/09	Emailing out task list and conference call info	0.25
	09/08/09	Talking to Sara Stevens re: tasks	0.33333
	09/09/09	Preparing for trial	2.05
	09/09/09	Call to Marty Weber	0.33333
	09/09/09	Email to clients re: settlement	0.20
	09/09/09	Responding to Bob Evans re: travel stuff	0.13333
	09/09/09	Conference call with Marty Weber and Hal Gillespie re: timeline	0.75
	09/09/09	Working on Bob Evans direct examination	3.00
	09/10/09	Reading Bob Evans deposition and working on direct examination	5.03333
	09/10/09	Calls to and from Hal Gillespie and Marty Weber re: Hal Gillespie's accident	1.00
	09/10/09	Responding to Melinda Barnes email	0.15
	09/10/09	Call to Christa Boyd re: exhibits	0.41667
	09/10/09	Emailing with counsel re: emergency motion for continuance	0.25
	09/11/09	Trial preparation: working on demonstrative exhibits and outlines	9.45
	09/11/09	Conference call to Plaintiffs	1.00
	09/12/09	Trial preparation: working on demonstrative exhibits and outlines	11.63333

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	Date	Memo	Qty
	09/13/09	Trial preparation: working on demonstrative exhibits and outlines	6.30
	09/13/09	Packing up and driving to Houston	5.00
	09/13/09	Meeting with Marty Weber in Houston	4.00
	09/14/09	Trial preparation: working on demonstrative exhibits and outlines	9.00
	09/16/09	Emailing with Court and counsel re: rescheduling trial date	0.30
	09/15/09	Breakfast with Bob Evans	1.00
	09/15/09	Meeting with Bob Evans and Marty Weber going over testimony	9.21667
	09/17/09	Driving back from Houston to Dallas	4.58333
	09/18/09	Emailing with Court and counsel re: rescheduling trial date	0.20
	09/23/09	Call to Marty Weber re: trial date	0.10
	09/23/09	Emailing Plaintiffs re: trial date	0.18333
	09/25/09	Reading emails from Bob Evans re: Alcoa and John Deere cases	0.15
	09/28/09	Emailing with Court and counsel re: rescheduling trial date	0.10
	09/29/09	Emailing with Court and counsel re: rescheduling trial date	0.10
	10/01/09	Emailing with Plaintiffs and co-counsel re: rescheduling trial date	0.10
	10/02/09	Reading email from Dennis Harthun re: travel plans for trial	0.05
	10/05/09	Reading email from Bob Evans re: direct examination	0.10
	10/08/09	Reading email from Harold Hamilton re: direct examination	0.05
	10/08/09	Reading email from Marty Weber re: new exhibit	0.05
	10/12/09	Emailing with co-counsel re: scheduling meeting	0.10
	10/13/09	Working on outline for Bob Evans Direct Examination	0.25
	10/14/09	Revising Bob Evans direct examination	0.73333
	10/14/09	Editing Bob Evans direct examination and emailing to Bob Evans	0.21667
	10/15/09	Revising trial to do list	0.08333
	10/15/09	Reading email from Bob Evans	0.08333
	10/15/09	Email to Marty Weber re: meeting	0.10
	10/15/09	Scheduling conference call with Evans	0.15
	10/19/09	Reading emails from Bob Evans re: Alcoa and John Deere cases	0.10
	10/22/09	Conference call with Marty Weber and Hal Gillespie	0.33333
	10/23/09	Reviewing Bob Evans testimony with him	1.23333
	10/24/09	Reading email from Bob Evans re: direct examination	0.10
	10/26/09	Making changes to Bob Evans Direct	0.78333
	10/26/09	Drafting outline for Dennis Harthun Direct examination	2.86667
	10/27/09	Sterling meeting re: trial strategy	5.25
	10/27/09	Drafting outline for Dennis Harthun Direct examination	1.75
	10/28/09	Emailing with Sara Stevens re: travel reservations	0.10
	10/29/09	Emailing co-counsel re: replacement of fiduciary	0.10
	10/30/09	Drafting outline for Dennis Harthun Direct examination	2.00
	11/03/09	Reading Harold Hamilton deposition and drafting outline for Harold Hamilton Direct examination	4.40
	11/04/09	Revising outlines for Direct testimony of Harold Hamilton, Dennis Harthun and Bob Evans	1.30
	11/05/09	Reading miscellaneous depositions in preparation for trial	0.23333
	11/05/09	Sending email to Hal Gillespie re: research project	0.10
	11/05/09	Reading Marty Weber 10/08 email re: exhibit	0.05
	11/05/09	Reading Hal Gillespie 10/27 email re: recap of meeting	0.05
	11/05/09	Reading Hal Gillespie 10/27 email re: Notes from pretrial meeting and notes	0.05

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Date	Memo	Qty
11/05/09	Reading Hal Gillespie's email response re: replacement of fiduciary	0.10
11/05/09	Reading and responding to Hal Gillespie's email re: cross reference table for exhibit lists	0.10
11/05/09	Responding to Marty Weber 11/2 email re: amended exhibit list	0.05
11/05/09	Reading Marty Weber 11/2 email regarding Defendants' exhibits 74-76	0.10
11/05/09	Reading 11/3 email from Hal Gillespie forwarding Kerry Notestine email re: witnesses	0.10
11/05/09	Reading email from Marty Weber re: witness subpoenas	0.05
11/05/09	Reading 11/3 email from Marty Weber re: timeline changes	0.10
11/05/09	Reading Marty Weber email of 11/4 re: OTC delisting of Sterling	0.10
11/05/09	Reading Marty Weber email re: Paul Vanderhoeven subpoena	0.05
11/05/09	Reading Marty Weber email of 11/4 re: Marcia Nieder and Richard Crump outlines	0.05
11/05/09	Reading Marty Weber email of 11/4 re: Delphi case	0.10
11/05/09	Call to Dennis Harthun re: his testimony	0.50
11/05/09	Call to Harold Hamilton re: his testimony	0.50
11/05/09	Call from Marty Weber	0.50
11/05/09	Reading Pretrial Order	0.20
11/05/09	Reading Carol Van Rensalier's deposition and sending specific page references to Marty Weber	2.30
11/06/09	Reading Pretrial Order materials	2.13333
11/06/09	Reading David Elkins deposition	3.00
11/06/09	Reading Richard Crump deposition	3.00
11/06/09	Emailing with co-counsel re: amended exhibit list	0.10
11/06/09	Reading email from Marty Weber re: fact issues for trial	0.10
11/06/09	Reading email from Christa Boyd re: trial brief	0.05
11/07/09	Reading depositions and other materials in preparation for trial	13.58333
11/08/09	Preparation for trial	10.00
11/08/09	Driving to Houston with Hal Gillespie	4.50
11/09/09	Meeting clients for pretrial preparation	1.50
11/09/09	Meeting with co-counsel	6.00
11/09/09	Refining direct examinations and going over with clients	4.00
11/09/09	Reading depositions	3.88333
11/10/09	Attending trial	8.00
11/10/09	Prepping for next day of trial	5.91667
11/11/09	Prepping for trial	9.58333
11/11/09	Rereading depositions and creating document with deposition cuts for Marty Weber to use with witnesses	3.00
11/12/09	Attending trial	8.00
11/12/09	Post-trial debriefing with Hal Gillespie & Marty Weber	4.00
11/13/09	Attending trial	8.00
11/13/09	Post-trial meeting	3.55
11/14/09	Driving back from Houston with Hal Gillespie	4.50
11/16/09	Reading emails from co-counsel re: post trial thoughts	0.25
11/16/09	Conference call with Marty Weber and Hal Gillespie	1.03333
11/17/09	Emailing with co-counsel re: post trial briefing	0.25
11/17/09	Call to Marty Weber re: research for Post-trial brief	0.33333
11/20/09	Reading email from Nitin Sud re: trial transcript	0.10
11/23/09	Reading emails from Marty Weber and Nitin Sud re: ordering trial transcript	0.10

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Date	Memo	Qty
12/01/09	Reading email from Marty Weber to Russell Post re: his involvement in case	0.10
12/02/09	Reading emails from Nitin Sud re: ordering transcript	0.05
12/02/09	Reading emails from Marty Weber and Russell Post re: his involvement in case	0.05
12/03/09	Reading email from Christa Boyd re: Response to Motion for Judgement	0.10
12/07/09	Email to Marty Weber re: post trial brief	0.10
12/08/09	Looking at recent briefs in which Halliburton was cited and forwarding items to Marty Weber	0.16667
12/21/09	Reading Marty Weber's email to Russell Post re: damages	0.08333
12/21/09	Reading email from Nitin Sud re: trial transcript	0.06667
12/23/09	Reading email from Bob Evans re: case update	0.03333
01/05/10	Reading emails from Marty Weber and Nitin Sud re: trial transcript	0.08333
01/06/10	Reading emails from Hal Gillespie and Marty Weber re: trial transcript	0.05
01/13/10	Reading email from Marty Weber re: Russell Post involvement	0.36667
01/14/10	Emailing Bobbi Villarreal to request case expenses	0.05
01/14/10	Reading emails from Bob Evans re: case update	0.06667
01/14/10	Emailing with Marty Weber re: using Russell Post	0.03333
01/15/10	Reading emails from Nitin Sud and Kerry Notestine re: question from court reporter for Steege testimony	0.06667
01/15/10	Email to Marty Weber re: agreement to hire Russell Post	0.06667
01/16/10	Reading emails from Russell Post and Marty Weber re: fee agreement	0.10
01/18/10	Reading emails from Russell Post and Marty Weber re: fee agreement	0.05
01/18/10	Reading emails from Kerry Notestine and Nitin Sud re: trial transcript	0.10
01/19/10	Reading the proposed addendum authored by Russell Post	0.41667
01/19/10	Conference calls with Marty Weber and Hal Gillespie to discuss	0.50
01/19/10	Making modifications to Marty Weber Addendum	0.50
01/20/10	Reading emails from Russell Post re: fee agreement	0.11667
01/20/10	Reading emails from Nitin Sud re: trial transcript	0.08333
01/20/10	Reading emails from Nitin Sud and Marty Weber re: post trial briefing deadline	0.05
01/21/10	Reading emails from co-counsel re: signed fee agreement with Russell Post	0.10
01/24/10	Reading email from Bob Evans re: travel expense reimbursement	0.05
01/25/10	Reading email from Nitin Sud re: citations to trial transcripts	0.05
01/26/10	Emailing trial transcripts to Russell Post	0.05
01/28/10	Reading emails from Russell Post and Marty Weber re: argument outline	0.10
01/29/10	Emailing with co-counsel re: Russell Post's argument outline	0.13333
02/04/10	Email to Plaintiffs re: status update and reading replies	0.20
02/08/10	Emailing with Plaintiffs and co-counsel re: scheduling a conference call	0.15
02/09/10	Conference call with clients re: status	0.65
02/17/10	Emailing with co-counsel re: post trial briefing	0.10
02/18/10	Reading emails from co-counsel re: Russell Post's post trial brief	0.15
02/19/10	Reading emails from co-counsel re: Russell Post's post trial brief	0.20
02/20/10	Reading emails from Hal Gillespie re: post trial brief	0.05
02/24/10	Reading emails from co-counsel re: final changes to post trial brief	0.11667
02/24/10	Reading and revising the post-trial brief	0.50
03/01/10	Emailing with co-counsel re: scheduling a conference call	0.10
03/02/10	Reading Defendants' post-trial brief	0.66667
03/02/10	Conference call with Russell Post to discuss strategy for response	1.00

**The Roper Firm
Sterling Chemicals
Attorney Time**

Date	Memo	Qty
03/02/10	Reading draft reply brief from Russell Post	0.16667
03/02/10	Reading emails from Marty Weber re: case expenses	0.05
03/05/10	Reading email from Russell Post re: reply brief	0.10
03/08/10	Reading emails from co-counsel re: conference call and reading final reply brief draft	0.20
03/08/10	Reading emails from Russell Post and Marty Weber re: Sterling's response	0.10
03/11/10	Reading and responding to email from Bob Evans re: post trial briefing status	0.13333
03/17/10	Emailing post trial briefings to Plaintiffs	0.08333
03/24/10	Doing Sterling expense reconciliation and emailing out	0.33333
04/09/10	Emailing Russell Post re: correct firm name	0.06667
04/13/10	Reading email from Chad Flores and letter from Defendants re: new case	0.11667
04/14/10	Reading draft response to letter filed by Defendants	0.15
06/09/10	Reading email from Bob Evans and Marty Weber's reply re: case update	0.10
07/02/10	Reading Court's Memorandum and Final Judgment	0.68333
07/02/10	Email to Marty Weber	0.15
07/02/10	Call from Marty Weber and conference in with Hal Gillespie to discuss opinion	1.00
07/02/10	Reading email from Russell Post	0.10
07/02/10	Emailing plaintiffs the opinion and re: proposed conference call	0.16667
07/02/10	Responding to Russell Post and proposing time for conference call	0.10
07/06/10	Conference call with Sterling Plaintiffs	0.50
07/06/10	Conference call with co-counsel re: appeal	0.50
07/06/10	Researching law on attorneys fees	0.25
07/14/10	Reading email from Chad Flores re: filing appeal	0.05
07/16/10	Email to Marty Weber re: bill of costs and reading his reply	0.08333
07/19/10	Reading emails from Marty Weber and Russell Post re: new Third Circuit opinion	0.10
08/02/10	Reading email from Christa Boyd re: her withdrawal from case	0.05
08/10/10	Reading emails from co-counsel re: settlement offer letter from Sterling	0.16667
08/10/10	Reading email from Marty Weber to Kelley Edwards re: rejecting offer	0.08333
08/13/10	Reading email from Marty Weber re: his call with Kerry Notestine	0.05
08/18/10	Reading Appellate Brief	0.05
09/22/10	Reading emails from Marty Weber and Chad Flores re: briefing deadline	0.05
11/01/10	Reading email from Sara Stevens re: outstanding invoices for depositions	0.03333
11/10/10	Email to Bob Evans re: appeal status	0.16667
11/11/10	Reading emails from Chad Flores re: how to appear in the 5 th Circuit	0.10
11/17/10	Emailing draft appellate brief to Plaintiffs	0.05
11/18/10	Reading Draft Appellate Brief	0.50
11/18/10	Call to Marty Weber to discuss potential changes to Appellate Brief	0.50
11/18/10	Conference call with Russell Post & Marty Weber to discuss potential revisions	0.75
11/19/10	Reviewing final Appellate Brief and email comments to and from co-counsel	0.50
01/28/11	Reading Sterling's Appellate Brief	0.30
01/31/11	Reading emails from Marty Weber and Chad Flores re: reply brief	0.08333
02/08/11	Email to Sara Stevens re: outstanding invoices	0.05
02/18/11	Reading draft reply brief and emails from Chad Flores and Russell Post	0.25
02/21/11	Reading final reply brief and emails from Russell Post and Marty Weber	0.20
06/09/11	Reading email from Bob Evans re: appeal update and replying	0.20
07/29/11	Reading emails from co-counsel re: appeal update	0.08333

The Roper Firm
Sterling Chemicals
Attorney Time

Date	Memo	Qty
08/04/11	Email to co-counsel re: travel plans for New Orleans for oral argument	0.08333
08/08/11	Reading email from Russell Post re: 28(j) letter	0.10
08/11/11	Emailing with Plaintiffs and co-counsel re: oral argument	0.18333
08/15/11	Reading letter from Kerry Notestine to 5th Circuit re: CIGNA opinion	0.16667
08/16/11	Making flight reservation for oral argument in New Orleans	0.15
08/29/11	Emailing with co-counsel re: oral argument panel	0.08333
08/30/11	Emailing with Russell Post re: travel plans for New Orleans	0.11667
08/31/11	Traveling to New Orleans for 5th Circuit Oral Arguments	2.50
08/31/11	Attending 5th Circuit Oral Arguments	3.00
08/31/11	Returning to Dallas from New Orleans	2.50
09/01/11	Reading email from Marty Weber re: his comments on oral argument	0.06667
09/04/11	Reading email from Bob Evans re: his comments on oral argument	0.05
09/17/11	Reading email from Bob Evans re: purchase of Sterling by Eastman	0.08333
10/13/11	Reading 5th Circuit opinion	0.45
10/13/11	Emails and calls to clients and to Ira Goldman and Vaughan Finn re: 5th Circuit decision	0.75
10/13/11	Call to Hal Gillespie re: opinion	0.50
10/13/11	Conference with Marty Weber re: next steps	0.75
10/14/11	Reading email from Russell Post re: 5 th Circuit decision	0.08333
10/18/11	Locating and reading Sterling's 8K and copy of Eastman/Sterling Merger agreement and forwarding to Marty Weber and Bob Evans	1.33333
10/18/11	Researching current state of atty's fees on ERISA in 5th Circuit	1.53333
10/19/11	Reading email from Marty Weber re: settlement negotiations	0.05
10/20/11	Emailing with co-counsel re: settlement issues	0.13333
10/21/11	Emailing with co-counsel and Plaintiffs re: conference call	0.15
10/26/11	Conference call with clients re: next steps	0.86667
10/26/11	Emailing with Marty Weber re: certification issues	0.10
10/27/11	Reading email from Russell Post re: Sterling's Petition for Rehearing En Banc	0.10
10/28/11	Emailing with co-counsel re: Hal Gillespie's conversation with Kerry Notestine re: settlement	0.13333
10/31/11	Emailing with Kerry Notestine re: conference call	0.05
11/02/11	Call to Marty Weber to discuss settlement issues	0.41667
11/02/11	Researching damages on Westlaw	1.00
11/03/11	Conference call with Hal Gillespie & Marty Weber	1.83333
11/04/11	Discussing damages with Marty Weber	23.98333
11/05/11	Discussing damages with Marty Weber	0.58333
11/09/11	Reading and responding to email from Marty Weber re: expenses to date	0.10
11/14/11	Reading denial of En Banc hearing and forwarding to Plaintiffs	0.15
11/17/11	Reading emails from Kerry Notestine re: conference call and damages information	0.10
11/15/11	Call from Marty Weber to discuss strategy and damages	1.16667
11/18/11	Reading email from Marty Weber to Adam Reese re: damages work	0.05
11/18/11	Reading emails from Kerry Notestine and Marty Weber re: Eastman plan	0.18333
11/18/11	Call from Marty Weber re: damages	0.50
11/20/11	Reading email from Adam Reese re: Eastman plan	0.10
11/22/11	Call from Marty Weber to discuss gathering damages data	0.55
11/22/11	Call from Bob Evans re: setting up conference call	0.30
11/23/11	Fee Research on Westlaw	1.45

The Roper Firm
Sterling Chemicals
Attorney Time

Date	Memo	Qty
11/28/11	Drafting talking points and FAQs for client calls	1.41667
11/28/11	Reading Kerry Notestine's letter to Court	0.15
11/28/11	Reading Russell Post's email re: Kerry Notestine's letter to Court	0.05
11/28/11	Reading Marty Weber's email re: Kerry Notestine's letter to Court	0.06667
11/29/11	Call to Marty Weber to discuss potential settlement structure	1.00
11/29/11	Reviewing Marty Weber's draft settlement proposal	1.58333
11/30/11	Email to Adam Reese re: project	0.15
11/30/11	Reading email from Hal Gillespie re: revisions to settlement proposal	0.10
11/30/11	Reading email from Adam Reese re: progress on his project	0.10
11/30/11	Reading Marty Weber's revised settlement proposal	0.43333
11/30/11	Searching for email from Bob Evans attaching client contact spreadsheet	0.13333
11/30/11	Emailing clients requesting updated version of spreadsheet	0.11667
11/30/11	Talking with Sara Stevens about client contact project	0.50
11/30/11	Drafting discovery to Sterling re: damages	0.93333
12/01/11	Reading emails from Harold Hamilton, Marty Weber and Hal Gillespie re: settlement proposal	0.20
12/01/11	Editing discovery to be sent to Sterling re: damages	1.90
12/02/11	Talking with Sara Stevens re: particular class members	0.25
12/02/11	Call to Marty Weber to discuss how to deal with particular class members	0.25
12/02/11	Calling class members	0.26667
12/03/11	Researching attorneys' fees issue: Reading Humphries v. United Way	0.25
12/03/11	Researching attorneys' fees issue: pulling annotations to 29 U.S.C. 132(g)	1.83333
12/03/11	Researching attorneys' fees issue	0.25
12/05/11	Reading email from Bob Evans re: settlement proposal	0.03333
12/05/11	Reading email from Harold Hamilton re: letter from Eastman	0.08333
12/05/11	Reading email from Adam Reese re: status of work	0.05
12/06/11	Discussing progress of calls with Sara Stevens	0.25
12/06/11	Reading email from Sara Stevens re: specific class member's damages	0.03333
12/07/11	Reading email from Adam Reese and forwarding to Hal Gillespie	0.18333
12/07/11	Reading email from Sara Stevens re: class members' damages	0.08333
12/07/11	Looking at complaint to see if \$50k medicare max is covered and emailing co-counsel	0.18333
12/07/11	Reading email from Marty Weber to Kerry Notestine re: \$50K cap	0.10
12/07/11	Reading email from Bob Evans re: issues with Eastman plan	0.08333
12/08/11	Reading and responding to emails from Plaintiffs re: Eastman plan	0.15
12/08/11	Reading Adam Reese's preliminary report	0.15
12/09/11	Emailing with counsel re: status conference	0.08333
12/09/11	Reading email from Sarah Morton re: protective order	0.05
12/09/11	Reading emails from Plaintiffs re: call from someone saying Eastman was going to be dropping their coverage	0.10
12/10/11	Reading Sterling's motion for protective order	0.46667
12/10/11	Reading Marty Weber's first draft of response to motion for protective order	0.75
12/10/11	Revising response to motion for protective order	1.50
12/10/11	Email to Chad Flores and Russell Post re: petition for writ of certiorari and reading their replies	0.15
12/11/11	Working on Response to Motion for Stay	1.38333
12/12/11	Reading email from Marty Weber to Kerry Notestine re: Eastman dropping coverage	0.06667
12/12/11	Working on Response to Motion for Stay	2.45

The Roper Firm
Sterling Chemicals
Attorney Time

	Date	Memo	Qty
	12/12/11	Emailing to co-counsel and reviewing their edits to Motion for Stay	0.50
	12/12/11	Email to Plaintiffs re: contact info for class members and reading their responses	0.10
	12/13/11	Conference call with Judge	0.33333
	12/13/11	Call to Marty Weber and Russell Post to discuss options	0.50
	12/13/11	Reading emails from Sara Stevens and Harold Hamilton re: possible class member	0.06667
	12/14/11	Reading emails from Sara Stevens and Jo Harthun re: contact info for class members	0.10
	12/14/11	Reviewing proposed order for response to motion for protective order	0.08333
	12/14/11	Reading email from Marty Weber re: status conference follow up	0.05
	12/15/11	Reading email from Jo Harthun re: contact info for class members	0.05
	12/15/11	Reading Adam Reese's draft report	0.15
	12/16/11	Reading letter from Kerry Notestine to Court	0.11667
	12/16/11	Reading email from Kerry Notestine re: coverage with Eastman and \$50K cap	0.08333
	12/16/11	Reading email from Sara Stevens to Marty Weber re: damages information	0.05
	12/16/11	Reading email from Marty Weber re: Sterling conference call and emailing clients re: conference call	1.90
	12/19/11	Reading email from Marty Weber re: working on demand letter	0.03333
	12/19/11	Reading email from Harold Hamilton re: life insurance coverage	0.05
	12/20/11	Talking with Sara Stevens re: damages spreadsheets in Sterling and editing demand	1.55
	12/20/11	Reading co-counsel's edits and comments on demand letter	0.15
	12/21/11	Reading email from Bob Evans re: settlement proposal	0.10
	12/24/11	Reading email from Hal Gillespie to Kerry Notestine re: settlement communication	0.03333
	12/28/11	Reading emails from Sara Stevens re: update on calls to class members	0.08333
	12/30/11	Reading email from Kerry Notestine re: discovery extension request	0.05
	01/03/11	Reading emails from Hal Gillespie and Marty Weber re: message from Kerry Notestine	0.05
	01/05/12	Reading letter from Kerry Notestine re: response to settlement demand	0.08333
	01/06/12	Emailing Ervin v. Texas Health Choice case to Marty Weber and reading his response	0.10
	01/06/12	Reading email from Sara Stevens re: question from class member	0.05
	01/09/12	Reading and responding to email from Sara Stevens re: discovery responses	0.03333
	01/13/12	Reading emails from Sarah Morton and Kerry Notestine re: discovery responses and mediation	0.06667
	01/16/12	Reading email from Sara Stevens re: deceased class members	0.05
	01/17/12	Conference call with Marty Weber to discuss next steps re: discovery and mediation	0.30
	01/17/12	Conference call with Kerry Notestine to discuss mediation and discovery	0.23333
	01/17/12	Email to Russell Post and Chad Flores re: disposing of counterclaim	0.16667
	01/17/12	Reading and responding to Russell Post's responsive emails re: conference call scheduling	0.16667
	01/20/12	Conference call on Strategy in Sterling with Co-counsel	0.83333
	01/21/12	Reading emails from Defense counsel re: discovery responses and scheduling of mediation	0.18333
	01/21/12	Emailing Hal Gillespie re: discussion of strategy	0.38333
	01/25/12	Researching and drafting Motion to Appoint Special Master	2.00
	01/26/12	Researching and drafting Motion to Appoint Special Master	0.36667
	01/27/12	Email to co-counsel re: Eastman acquisition of Solutia	0.05
	01/27/12	Reading email from Sarah Morton re: discovery responses	0.05
	01/30/12	Reading email from Marty Weber re: damages calculations	0.06667
	01/30/12	Call from Marty Weber re: damages in Sterling case	0.66667
	01/30/12	Call to Marty Weber and then conferencing Sarah Morton to discuss damages issues	0.41667
	01/30/12	Asking Sara Stevens to send me email of class members we haven't talked to, then reviewing and forwarding to Marty Weber	0.16667

**The Roper Firm
Sterling Chemicals
Attorney Time**

	Date	Memo	Qty
	01/31/12	Talking with Marty Weber re: mediation scheduling	0.11667
	01/31/12	Emailing Sara Stevens to check availability of Mark Rudy for mediation	0.05
	01/31/12	Reading email from Rex Burch forwarded from Marty Weber re: mediators and responding	0.08333
	01/31/12	Emailing Defense attorneys re: potential mediators	0.16667
	01/31/12	Researching and drafting Motion to Appoint Special Master	0.53333
	02/01/12	Researching and drafting Motion to Appoint Special Master	1.75
	02/07/12	Gathering dates for mediation and comparing and sending to Kerry Notestein	0.26667
	02/08/12	Numerous emails to co- and defense counsel re: scheduling mediation	0.41667
	02/08/12	Instructing Sara Stevens re: calls to potential mediators	0.16667
	02/09/12	Researching caselaw for Motion to Appoint Special Master	0.58333
	02/09/12	Talking to Marty Weber re: settlement issues	0.41667
	02/09/12	Reading emails from Sara Stevens re: Larry Mayo and mediation	0.18333
	02/09/12	Reading cases for special master motion: Trull v. Dayco; Hatteburg v. Red Adair; Castaneda v. Burger King; Cardoza v. Pac Steel; Aguilar v. Mekonian; Young v. Pierce; Coleman v. Wilson; Wasley v. Bulakites; U.S. v. NY; Olden v. LaFarge; Wilson v County of Gloucester; Rombiero v. UnumProvident; Amjur on Special Masters; Newberg's chapter on Availability of Damages and other monetary recoveries	1.93333
	02/09/12	Reading Motion for Temporary Injunction and emailing proposed revisions of same to Russell Post	0.08333
	02/09/12	Call to Marty Weber re: discovery responses	0.26667
	02/09/12	Reading Sterling's discovery requests	0.13333
	02/09/12	Emailing Marty Weber re: discovery	0.05
	02/10/12	Talking with Marty Weber re: discovery responses	0.33333
	02/10/12	Going though discovery	0.58333
	02/10/12	Editing letter to class members	0.33333
	02/10/12	Reading emails from Marty Weber and Sara Stevens re: settlement amount	0.05
	02/10/12	Reading email from Sara Stevens re: addresses for class members	0.03333
	02/10/12	Reading emails from co-counsel re: temporary injunction	0.05
	02/10/12	Reading email from Rex Burch re: special master	0.03333
	02/10/12	Reading email from Christopher Nolland's office confirming mediation	0.03333
	02/13/12	Emailing co-counsel re: receipt of Petition for Writ of Certiorari	0.05
	02/13/12	Reading Sterling's Petition for Writ of Certiorari	0.51667
	02/13/12	Emailing clients re: mediation	0.30
	02/13/12	Reading Russell Post's analysis of Petition for Writ of Certiorari	0.16667
	02/13/12	Working on Motion for appointment of special Master	1.00
	02/13/12	Reading U.S. v. Conservation Chemical Company	0.15
	02/14/12	Responding to Bob Evans email re: conference call	0.08333
	02/14/12	Email to co-counsel re: conference call	0.16667
	02/14/12	Editing letter transmitting discovery to class members and signing all letters	0.30
	02/14/12	Working on motion to appoint special master: reading Cronin v. Browner	0.15
	02/14/12	Working on motion to appoint special master: reading U.S. v. Conn.	0.15
	02/14/12	Working on motion to appoint special master: reading Hilao v. Estate of Marcos	0.15
	02/14/12	Call from Marty Weber to discuss mediation strategy	0.43333
	02/14/12	Westlaw research on special master and editing motion	4.03333
	02/15/12	Reading email from Marty Weber re: Christopher Nolland's mediation fee	0.05
	02/15/12	Reading Russell Post's edits to Motion to Appoint Special Master	0.10
	02/15/12	Reading email from Sara Stevens re: time records	0.03333

The Roper Firm
Sterling Chemicals
Attorney Time

Date	Memo	Qty
02/15/12	Reading email from Marty Weber and co-counsel re: proposed letter to Christopher Nolland	0.10
02/15/12	Reading email from Christopher Nolland's office re: mediation rules	0.10
02/16/12	Reading emails from Marty Weber and Sara Stevens re: letter being sent to class members	0.08333
02/17/12	Emailing with co-counsel re: mediation and damages	0.15
02/17/12	Drafting analysis of Dukes v. Walmart impact on class	2.71667
02/17/12	Conference call with clients	0.75
02/18/12	Reading email from Russell Post re: damages cases	0.10
02/21/12	Reading emails from Marty Weber and Sara Stevens re: outstanding invoices	0.05
02/21/12	Emailing with co-counsel re: mediation and settlement negotiations moving forward	0.20
02/21/12	Reading email from Sara Stevens and counsel re: phone conference with Christopher Nolland	0.13333
02/22/12	Reviewing and revising time records	3.45
02/22/12	Reading emails from Plaintiffs and Marty Weber re: mediation	0.13333
02/23/12	Meeting with Marty Weber prior to mediation; attending mediation	13.00
02/24/12	Call to Hal Gillespie re: settlement progress	0.21667
02/24/12	Call to Marty Weber re: status of settlement talks	0.11667
02/24/12	Reviewing Hal Gillespie's proposed changes to settlement memorandum	0.23333
02/26/12	Reading email from Dennis Harthun re: damages documentation	0.03333
02/27/12	Emailing with co-counsel re: case issues and \$50K cap	0.10
02/28/12	Reading emails from Marty Weber and Russell Post re: proposed settlement agreement	0.11667
02/28/12	Talking with Marty Weber and Hal Gillespie re: settlement issues	1.41667
02/29/12	Conference with Marty Weber and Hal Gillespie re: attorneys' fees	0.20
02/29/12	Sending email to Plaintiffs Attaching Settlement proposal to be transmitted to Defendants	0.25
02/29/12	Sending email to Kerry Notestine requesting discovery extension and reading his response	0.13333
02/29/12	Emailing with co-counsel re: time and expense records	0.10
02/29/12	Emailing damages spreadsheets to Marty Weber	0.05
02/29/12	Researching attorney fees issue	2.15
03/01/12	Reading email from Bob Evans re: settlement proposal	0.85
03/01/12	Reading email from Marty Weber re: next steps in settlement and responding	0.16667
03/01/12	Reading email from Harold Hamilton re: settlement proposal	0.16667
03/01/12	Reading email from Marty Weber re: Newberg's	0.16667
03/01/12	Responding to Bob Evans email	0.18333
03/02/12	Emailing with Plaintiffs and co-counsel re: settlement proposal	0.10
03/03/12	Reading email from Kerry Notestine and co-counsel's responses re: Sterling's consent to chambers' participation as an Amicus	0.06667
03/05/12	Reading emails from co-counsel re: amicus curiae and settlement discussions	0.10
03/05/12	Reading email from Marty Weber to Plaintiffs re: amicus curiae	0.10
03/06/12	Emailing with co-counsel and Plaintiffs re: revised demand letter	0.25
03/06/12	Preparing for Settlement Conference call	1.00
03/06/12	Conference call with Defendants re: settlement	0.75
03/06/12	Reading Shaver v. Siemens	0.25
03/12/12	Reading offer from Sterling	0.16667
03/12/12	Call to Marty Weber to discuss offer from Sterling	0.20
03/12/12	Call to Russell Post to find out status of Supreme Court certiorari	0.25
03/12/12	Call to Hal Gillespie to check availability for conference call	0.08333
03/12/12	Making changes to Motion to Appoint Special Master and transmitting to Defense counsel	0.73333

The Roper Firm
Sterling Chemicals
Attorney Time

Date	Memo	Qty
03/12/12	Reading Letter from Notestine re: Shaver case to Supreme Court	0.08333
03/13/12	Reading email from Russell Post re: Supreme Court docket and responding	0.11667
03/14/12	Reading Sterling's offer	0.20
03/14/12	Emailing comments to co-counsel and reading email responses from Russell Post and Marty Weber	0.15
03/14/12	Talking to Sara Stevens re: discovery responses due to Sterling	0.16667
03/14/12	Emailing co-counsel an update on discovery responses	0.10
03/19/12	Emailing with co-counsel and Plaintiffs re: certiorari denied and next steps	0.20
03/19/12	Working on responses to Defendant's discovery requests	0.71667
03/21/12	Call to discuss discovery responses with Marty Weber	0.75
03/21/12	Drafting objections and responses to Sterling discovery requests	5.36667
03/21/12	Emailing with co-counsel re: expert issues, final version of settlement proposal, and appeal of termination letter	0.25
03/21/12	Reviewing new administrative claim for \$50K limit and offering revisions	0.40
03/21/12	Reviewing and approving Hal Gillespie's revisions	0.18333
03/22/12	Working on discovery responses	5.23333
03/22/12	Reading emails from co-counsel re: appeal to Eastman on \$50K cap	0.10
03/22/12	Researching potential special masters	0.73333
03/22/12	Call to Kent Germann to check his availability as Special Master	0.10
03/23/12	Talking with Kent German re: serving as special master	0.25
03/26/12	Emailing copy of complaint and 5th Circuit opinion to Kent Germann	0.10
03/26/12	Emailing co-counsel re: potential Special Master	0.10
03/27/12	Emailing Kent German re: other candidates for special master	0.10
03/27/12	Emailing Hal Gillespie re: other candidates for special master	0.08333
03/27/12	Email to co-counsel re: pending issues	0.10
03/28/12	Reading emails from Russell Post re: pending issues	0.11667
03/29/12	Call to Stephanie Noonan (left message)	0.06667
03/29/12	Talking with Marty Weber re: discovery	0.03667
03/29/12	Conference call with Christopher Nolland and Marty Weber re: settlement progress	0.08333
03/29/12	Reminding Marty Weber to email Adam Reese	0.03333
03/29/12	Reading email from Adam Reese re: expert availability and terms of extension	0.50
03/29/12	Reading email from Adam Reese re: extension of expert retention and plan going forward for expert data, and response from Marty Weber	0.10
03/29/12	Reading email from Adam Reese re: file portal and forwarding to Sara Stevens	0.06667
04/01/12	Reading email from Stephanie Noonan	0.05
04/02/12	Reading email from Sara Stevens re: class members who still need to be contacted	0.08333
04/02/12	Call to Stephanie Noonan and email	0.66667
04/03/12	Call with Marty Weber to discuss getting damages info into final form	0.16667
04/03/12	Editing special master motion to remove proposed special master	0.38333
04/03/12	Reading email from Marty Weber to Kerry Notestine re: damages spreadsheet	0.05
04/03/12	Working on attorneys' fees application and emailing to Marty	0.91667
04/03/12	Call from Marty Weber to discuss his conversation with Sarah Morton, changes to Motion to Appoint Special Master, and damages issues	0.25
04/04/12	Reading email from Marty Weber to Kerry Notestine re: premium issue	0.10
04/04/12	Reading order from Judge Hoyt re: expedited response on Special Master Motion	0.11667
04/06/12	Reading Kerry Notestine's response to email from Marty Weber re: premium issue	0.10

The Roper Firm
Sterling Chemicals
Attorney Time

	Date	Memo	Qty
	04/09/12	Reviewing Draft motion for temporary injunction and accompanying declarations and suggesting revisions to Marty Weber via email	0.56667
	04/10/12	Reading emails from Marty Weber and Kerry Notestine re: deposition of corporate representative	0.06667
	04/10/12	Reading email from Marty Weber to Bob Evans re: declaration in support of temporary injunction	0.03333
	04/10/12	Reading email from Chad Flores re: changes to temporary injunction	0.05
	04/10/12	Reading emails from Marty Weber and Sara Stevens re: contact info for class members	0.05
	04/10/12	Reading emails from Marty Weber and Sarah Morton re: list of class members	0.10
	04/10/12	Reading email from Bob Evans re: signing his declaration	0.03333
	04/11/12	Returning Telephone call to Stephanie Noonan (Milliman actuary) and discussing possibility of Suzanne Taranto as Special Master	0.18333
	04/11/12	Email to Suzanne Taranto re: CV and setting up time to talk	0.05
	04/11/12	Reading emails from Kerry Notestine and Marty Weber re: post 65 cost	0.10
	04/12/12	Reading emails from co-counsel re: temporary injunction	0.11667
	04/12/12	Researching Sterling Damages issues	1.26667
	04/12/12	Talking with potential special master candidate Suzanne Taranto	0.20
	04/12/12	Emailing case documents to Suzanne Taranto	0.10
	04/12/12	Reading email from Marty Weber re: revised declaration for temporary injunction	0.05
	04/12/12	Reading emails from Sarah Morton and Marty Weber re: supplemental discovery responses	0.10
	04/12/12	Reading emails from co-counsel re: talking to Christopher Nolland	0.06667
	04/12/12	Reviewing Draft Temporary Injunction Motion and attachments	0.48333
	04/12/12	Sending proposed changes to Marty Weber	0.10
	04/13/12	Reading email from Sarah Morton re: terminated class members	0.06667
	04/13/12	Calling Marty Weber to discuss Larocca case	0.15
	04/13/12	Researching damages	1.55
	04/16/12	Reading Sterling's Motion for Partial Summary Judgment and discussing response with Marty Weber	0.85
	04/16/12	Sending results of research to Russell Post and Chad Flores	0.20
	04/16/12	Reading response to special master motion	0.11667
	04/16/12	Editing letter to class members and emailing to Marty Weber	0.31667
	04/17/12	Reading email from Russell post re: damages research and responding	0.16667
	04/17/12	Emailing group re: my availability 4/26 to 4/30	0.08333
	04/17/12	Reading emails from co-counsel re: damages research and \$50K cap issues	0.10
	04/17/12	Talking to Sara Stevens re: supplementing discovery	0.33333
	04/17/12	Reading email from Suzanne Tarnato re: unavailability to work on case	0.05
	04/18/12	Call to Marty Weber re: deposition topics and making my edits to his topics and emailing back	0.33333
	04/18/12	Call back from Marty Weber re: damages issues	0.16667
	04/18/12	Editing discovery answers for several class members	2.11667
	04/18/12	Reading emails from Sara Stevens re: class members whose spouses dropped Sterling plan	0.10
	04/23/12	Reading Sterling's Partial MSJ/response to Temporary Injunction motion	0.20
	04/23/12	Responding to email from Marty Weber re: motion and forwarding summary to him	0.10
	04/23/12	Call to Hal Gillespie to discuss Sterling's response	0.15
	04/23/12	Emailing Sterling response and order on special master to clients	0.10
	04/23/12	Reading email from Russell Post re: his take on Sterling's response	0.16667
	04/23/12	Reviewing Sara Stevens's discovery responses for class members Lonnie Galloway, Ernest Bancroft and Johnny Bonner	0.38333
	04/23/12	Reading email from Sara Stevens re: class member Irving Moulton	0.05
	04/24/12	Conference call re: special master	0.65

The Roper Firm
Sterling Chemicals
Attorney Time

	Date	Memo	Qty
	04/24/12	Call to Adam Reese for Special Master Recommendations	0.05
	04/24/12	Reviewing discovery answers for class member James Morris	0.11667
	04/24/12	Editing supplemental and amended discovery responses and talking with Sara Stevens about format	0.16667
	04/25/12	Call from Adam Reese re: potential special master	0.33333
	04/25/12	Reading email from David Axene (potential special master) and his CV	0.20
	04/25/12	Emailing various case filings to David Axene	0.10
	04/25/12	Call to Marty Weber re: David Axene and Preliminary Injunction Reply	0.81667
	04/27/12	Working on Order on Motion to Appoint Special Master	4.41667
	04/27/12	Calls to and from David Axene	0.25
	04/27/12	Working on Declaration of David Axene	0.33333
	05/02/12	Conference call with clients and co-counsel to discuss strategy	1.08333
	05/03/12	Working on Special Master Order	1.71667
	05/03/12	Transmitting Special Master Order to co-counsel and incorporating their edits	0.30
	05/03/12	Finalizing David Axene's declaration and emailing to him	0.41667
	05/04/12	Reading Defendant's reply re: preliminary injunction	0.11667
	05/07/12	Reviewing Adam Reese's report and checking for specific class members	1.36667
	05/07/12	Talking to Adam Reese and Marty Weber re: changes to the report	0.75
	05/07/12	Forwarding report revisions to Adam Reese	0.16667
	05/07/12	Checking final version of Adam Reese's report	0.75
	05/08/12	Reading emails from Kerry Notestine re: special master	0.13333
	05/08/12	Reviewing Adam Reese's report and call to Marty Weber to create spreadsheet for Adam Reese's numbers	1.00
	05/08/12	Giving instructions to Sara Stevens re: filling in spreadsheet	0.33333
	05/08/12	Emailing responses to Hal Gillespie's response to Kerry Notestine's email to Palacios	0.25
	05/11/12	Reading Court's order on Special Master appointing David Axene	0.10
	05/11/12	Drafting proposed email to David Axene for counsel	0.25
	05/11/12	Talking to Marty Weber about email re: special master	0.50
	05/11/12	Call from Marty Weber and Hal Gillespie re: demand	0.50
	05/12/12	Reviewing draft response to Response to Defendants' Second Motion to Dismiss and emailing proposed revisions to Chad Flores, etc.	0.53333
	05/14/12	Calls to Marty Weber re: settlement demand and re: conference call times with David Axene	0.30
	05/14/12	Reviewing final version of second Motion for Summary Judgment response sent by Russell Post and Marty Weber	0.65
	05/23/12	Conversation with Marty Weber and Hal Gillespie re: settlement	0.41667
	05/24/12	Talking to co-counsel re: settlement details	0.50
	05/24/12	Reviewing and revising Memorandum of Understanding pursuant to Marty Weber's request	1.41667
	05/24/12	Emailing revisions to Memorandum of Understanding to Marty Weber	0.10
	05/24/12	Call from Marty Weber re: changes to Memorandum of Understanding	0.30
	05/29/12	Discussing settlement structure and notice issues with Rich Norman and Marty Weber	0.58333
	06/01/12	Conference call with Hal Gillespie and Marty Weber re: settlement terms	0.41667
	06/01/12	Conference call with Marty Weber and Kerry Notestine re: settlement terms	0.50
	06/01/12	Researching issue related to settlement	1.36667
	06/04/12	Call to Marty Weber re: settlement issues	0.33333
	06/04/12	Researching the issue of altering class after finding on the merits	1.40
	06/04/12	Emailing results of issue of altering class to co-counsel	0.20
	06/04/12	Call from Marty Weber re: class definition	0.25

The Roper Firm
Sterling Chemicals
Attorney Time

	Date	Memo	Qty
	06/04/12	Emailing Russell Post re: class definition	0.10
	06/05/12	Emailing with co-counsel re: conference call	1.41667
	06/08/12	Call to Marty Weber to discuss mechanics of settlement with respect to assistance to persons who have outstanding medical liens	0.25
	06/08/12	Reading email from Marty Weber to Kerry Notestine re: settlement specifics	0.16667
	06/11/12	Reading email from Kerry Notestine and changes contained in revised Memorandum of Understanding	0.33333
	06/27/12	Working on Motion for Preliminary Approval of Settlement	3.03333
	06/28/12	Reviewing settlement agreement	0.50
	06/28/12	Revising settlement agreement	4.10
	06/28/12	Call to Marty Weber re: settlement agreement	0.50
	06/28/12	Call to Russell Post re: settlement agreement	0.50
	06/29/12	Working on Motion for Preliminary Approval of Settlement	6.20
	07/02/12	Working on Motion for Preliminary Approval of Settlement	2.95
	07/03/12	Working on Motion for Preliminary Approval of Settlement	4.35
	07/04/12	Working on Motion for Preliminary Approval of Settlement	3.86667
	07/09/12	Call to Marty Weber to discuss his changes to Motion for Preliminary Approval of Settlement	0.33333
	07/09/12	Editing settlement documents	1.81667
	07/10/12	Making revisions to Class action notice	0.58333
	07/10/12	Making revisions to Proof of claim form	0.50
	07/10/12	Revising Motion for Preliminary Approval	1.36667
	07/10/12	Reviewing and editing Motion to Reinstate and sending to Marty Weber	0.33333
	07/10/12	Reviewing Kerry Notestine's changes to settlement agreement	0.33333
	07/10/12	Editing class representatives' affidavits	0.75
	07/10/12	Drafting motion for leave to amend class definition	0.41667
	07/11/12	Working on Motion to Amend class definition	0.55
	07/12/12	Reading changes to settlement agreement and responding	0.40
	07/12/12	Working on motion for leave to amend class order/definition	0.48333
	07/12/12	Discussing settlement agreement language with Marty Weber	0.30
	07/13/12	Reading revisions to motion for leave to amend class definition and responding	0.26667
	07/13/12	Working on Bob Evans's declaration	0.50
	07/13/12	Call to Marty Weber re: declaration	0.25
	07/13/12	Call to Bob Evans re: his declaration	0.25
	07/16/12	Reading Kerry Notestine's changes to Settlement Agreement and making proposed revisions	0.31667
	07/16/12	Reading Kerry Notestine's changes to the Claim Form to confirm no changes necessary	0.16667
	07/18/12	Call to Bob Evans to check on status of his declaration	0.40
	07/19/12	Call to Harold Hamilton and Dennis Harthun re: their declarations	0.50
	07/19/12	Call to Marty Weber re: preexisting medical question posed by Dennis Harthun	0.33333
	07/19/12	Talking to Sara Stevens re: putting spreadsheet together for Harold Hamilton and other class representatives	0.25
	07/19/12	Emailing draft Bob Evans Declaration to Marty Weber	0.10
	07/19/12	Reviewing Marty Weber's and Russell Post's declarations	0.41667
	07/19/12	Working on my declaration for settlement	1.81667
	07/19/12	Call to Bob Evans re: his declaration	0.20
	07/20/12	Revising my declaration	1.75
	07/20/12	Talking to Marty Weber re: Bob Evans declaration	0.41667

**The Roper Firm
Sterling Chemicals
Attorney Time**

Date	Memo	Qty
07/20/12	Revising Bob Evans declaration	0.50
07/20/12	Call to Bob Evans re: his declaration	0.25
07/20/12	Revising Dennis Harthun declaration	0.433333
07/20/12	Revising Harold Hamilton declaration	0.466667
07/20/12	Searching for authorities for Sara Stevens to attach in Appendix	0.333333
07/30/12	Call to Sarah Morton re: addresses for class members	0.166667
07/30/12	Talking to Sara Stevens re: schedule	0.116667
07/30/12	Reviewing schedule	0.10
07/30/12	Reading Preliminary Approval Order	0.15
07/31/12	Conference call with Rust to discuss getting them address data	0.416667
07/31/12	Conference call with Kerry Note亭ine and Marty Weber re: date that retirees will be moved to new plan	0.333333
08/03/12	Talking with Hal Gillespie re: attorney fee brief	0.25
08/03/12	Working on Application for Attorneys' Fees	1.533333
08/07/12	Reviewing forms sent by Rust	0.50
08/07/12	Reviewing data from Sterling	0.25
08/07/12	Making revisions to notice	0.866667
08/07/12	Talking with Marty Weber and Sarah Morton re: claims form changes	0.333333
08/07/12	Talking with Marty Weber re: need for hearing to alert Court to changes	0.20
08/08/12	Proofing revised notice	0.10
08/08/12	Proofing settlement website	0.20
08/08/12	Working on Application for Attorneys' Fees	0.35
08/09/12	Working on Application for Attorneys' Fees	1.25
08/14/12	Talking with Marty Weber and then Sara Stevens re: responding to calls from class members	0.366667
08/16/12	Call to Colin Gillis re: his particular claim	0.50
08/16/12	Call to Cecil Lurvey re: his particular claim	0.50
08/16/12	Working on Application for Attorneys' Fees	2.333333
08/17/12	Working on Application for Attorneys' Fees	4.616667
08/18/12	Working on Application for Attorneys' Fees	5.20
08/19/12	Working on Application for Attorneys' Fees	3.45
08/20/12	Working on Application for Attorneys' Fees	3.633333
08/21/12	Working on my Declaration in support of Application for Attorneys' Fees	3.10
08/22/12	Working on my Declaration in support of Application for Attorneys' Fees	5.766667
08/22/12	Reading email from Sara Stevens re: potential class member Lloyd Sellier	0.20
08/22/12	Call from Marty Weber re: Lloyd Sellier and declaration	0.50
08/23/12	Working on Application for Attorneys' Fees	0.633333
	Total Hours	1,276.879898

Exhibit B

The Roper Firm
Sterling Chemicals
Paralegal Time

	Date	Description	Qty
	02/09/07	Setting up file materials	0.50
	02/09/07	Evaluating and organizing key documents	1.00
	02/09/07	Scanning documents	0.50
	02/12/07	Evaluating and organizing key documents	0.50
	02/12/07	Preparing binder for attorneys' use and forwarding to Hal Gillespie and Marty Weber	0.50
	02/15/07	Contacting court regarding Application for admission to Southern District for Walt Roper	0.25
	02/15/07	Drafting application for admission to Southern District	1.00
	02/15/07	Forwarding application for admission to Marty Weber for review and signature	0.20
	02/15/07	Reading email from Marty Weber re: application for admission	0.10
	02/15/07	Finalizing application and forwarding to the court	1.45
	02/16/07	Receiving and reviewing correspondence from client and forwarding to Walt Roper and Marty Weber for review	0.20
	02/16/07	Reviewing and revising Original Complaint	1.00
	02/19/07	Receiving and reviewing pretrial setting order	0.15
	02/19/07	Calendaring deadlines from pretrial order	0.35
	02/19/07	Reading email from Karla Jackson	0.10
	02/19/07	Phone conference with clients	0.40
	02/20/07	Talking with Walt Roper re: service of complaint	0.35
	02/20/07	Phone conference with Marty Weber	0.30
	02/20/07	Contacting process server and coordinating service of complaint	0.35
	02/21/07	Emailing with Marty Weber, Walt Roper, and process server re: confirmation of service of complaint	0.50
	02/28/07	Multiple phone conferences with clients	0.60
	02/28/07	Preparing case information memo and forwarding to Karla Jackson	0.40
	03/13/07	Receiving and reviewing Defendant's Answer and updating file	0.20
	04/10/07	Receiving and reviewing email correspondence from Walt Roper and Marty Weber	0.25
	04/10/07	Calendaring upcoming deadlines	0.25
	04/26/07	Receiving and reviewing discovery management plan	0.20
	04/26/07	Updating file	0.10
	04/26/07	Calendaring upcoming deadlines	0.20
	05/15/07	Receiving and reviewing correspondence from client	0.10
	05/15/07	Forwarding correspondence from client to Walt Roper for review	0.10

The Roper Firm
Sterling Chemicals
Paralegal Time

	Date	Description	Qty
	05/15/07	Receiving and reviewing court's scheduling order	0.10
	05/15/07	Talking with Walt Roper regarding scheduling order	0.10
	05/15/07	Calendaring deadlines	0.10
	05/30/07	Contacting court re: electronic filing	0.15
	05/30/07	Receiving and reviewing. email from court regarding account for electronic filing	0.15
	06/05/07	Receiving and reviewing order re: voluntary dismissal	0.10
	06/05/07	Emailing with Walt Roper re: electronic filing	0.10
	06/05/07	Phone conference with court re: electronic filing	0.10
	06/05/07	Phone conference with court regarding electronic filing	0.20
	06/05/07	Email to Mr. Roper re: status of electronic filing	0.10
	06/28/07	Receiving and reviewing Defendant's Answer	0.30
	06/28/07	Receiving email from Walt Roper re: disclosures	0.10
	06/28/07	Retrieving and scanning disclosures and forwarding to Marty Weber for review	0.30
	07/06/07	Receiving and reviewing Defendants' Motion to Dismiss	0.30
	07/24/07	Drafting client declarations	1.45
	07/24/07	Forwarding declarations to clients for signature	0.30
	07/24/07	Multiple phone conferences with clients	0.75
	07/25/07	Finalizing client declarations and forwarding to clients	2.00
	07/25/07	Multiple phone conferences and emails with clients	0.80
	07/25/07	Phone conference with Marty Weber re: declarations	0.30
	07/25/07	Forwarding signed declarations to Marty Weber	0.10
	07/26/07	Evaluating and organizing file materials	0.30
	08/06/07	Receiving and reviewing emails re: discovery	0.30
	09/11/07	Evaluating and organizing file materials	0.20
	09/24/07	Emailing Karla Jackson and Walt Roper re: Defendants' document production	0.20
	09/27/07	Phone conference with Karla Jackson re: Defendants' document production	0.30
	09/27/07	Reviewing email from Karla Jackson	0.10
	09/27/07	Updating database	0.10
	10/05/07	Talking with Walt Roper re: scheduling of depositions	0.15
	10/05/07	Phone conference with clients	0.25
	10/05/07	Emailing opposing counsel dates clients are available for deposition	0.10
	10/08/07	Phone conference with Harold Hamilton re: documents	0.20
	10/08/07	Receiving and reviewing email from Harold Hamilton and forwarding documents to Walt Roper for review	0.10

The Roper Firm
Sterling Chemicals
Paralegal Time

	Date	Description	Qty
	10/12/07	Multiple emails with Marty Weber and clients regarding scheduling of depositions	0.60
	10/12/07	Multiple phone conferences with clients regarding scheduling of depositions	0.60
	10/16/07	Talking with Walt Roper regarding the scheduling of depositions	0.50
	10/16/07	Receiving and reviewing emails from opposing counsel regarding scheduling	0.50
	10/17/07	Multiple phone conferences with clients re: scheduling of depositions	0.70
	10/23/07	Multiple phone conferences and emails with clients and Marty Weber regarding travel and scheduling of depositions	0.75
	10/23/07	Coordinating travel arrangements with clients	0.75
	11/01/07	Talking with Walt Roper re: potential experts	0.25
	11/01/07	Researching potential experts	1.00
	11/01/07	Multiple phone conferences and emails with potential experts	0.50
	11/01/07	Receiving and reviewing CVs of potential experts and forwarding to Walt Roper for review	0.25
	11/05/07	Multiple emails and phone conferences with potential experts and Marty Weber re: scheduling of phone conferences and conflict of interest checks	2.00
	11/07/07	Talking with Walt Roper re: scheduling of phone conferences with potential experts	0.50
	11/07/07	Multiples phone conferences with potential experts regarding availability	4.00
	11/07/07	Multiple emails confirming conference calls to Walt Roper and Marty Weber	0.50
	11/09/07	Evaluating and organizing documents to forward to clients for review	3.50
	11/09/07	Talking with Walt Roper regarding documents to send to clients	0.35
	11/09/07	Forwarding documents to clients	0.15
	11/12/07	Multiple phone conferences with clients re: upcoming depositions	0.50
	11/12/07	Evaluating and organizing materials for clients to review in preparation for deposition	0.80
	11/12/07	Forwarding materials to clients for their depositions	0.20
	11/20/07	Phone conferences with clients re: document production	0.50
	11/27/07	Receiving email from client re: document production and forwarding to Walt Roper and Karla Jackson	0.50
	11/30/07	Multiple phone conferences and emails re: upcoming depositions and document production with clients, Walt Roper, and Karla Jackson	0.75
	12/04/07	Multiple emails and phone conferences re: retainer agreement with Adam Reese	0.35
	12/04/07	Forwarding signed retainer agreement to Adam Reese	0.15
	12/17/07	Evaluating and organizing file materials	0.50
	01/02/08	Receiving and reviewing fax from Bob Evans and forwarding to Marty Weber, Hal Gillespie, and Walt Roper for review	0.20
	01/07/08	Receiving and reviewing deposition transcript of Dennis Harthun and forwarding to client for review and signature	0.30

The Roper Firm
Sterling Chemicals
Paralegal Time

	Date	Description	Qty
	01/10/08	Receiving and reviewing deposition transcript of Harold Hamilton and Bob Evans and forwarding to client for review and signature	0.50
	01/15/08	Multiple emails and phone conferences with clients regarding signatures of deposition transcripts	0.50
	01/16/08	Multiple emails and phone conferences with clients regarding signatures of deposition transcripts	0.50
	01/23/08	Talking with Walt Roper re: upcoming deadlines and receiving email regarding the same	0.50
	01/29/08	Emailing Hal Gillespie re: deposition transcripts	0.30
	01/30/08	Multiple emails and phone conferences with Bob Evans re: deposition revisions	0.50
	02/04/08	Talking with Walt Roper re: client affidavits	0.50
	02/04/08	Preparing affidavits for clients	4.00
	02/04/08	Multiple conference calls with clients re: affidavits	1.00
	02/05/08	Multiple emails and phone conferences with clients regarding affidavits in support of Motion for Class Certification	1.00
	02/05/08	Revising affidavits and forwarding to clients	3.00
	02/06/08	Multiple emails and phone conferences with clients regarding affidavits in support of Motion for Class Certification	2.00
	02/07/08	Drafting Affidavit of Walt Roper and forwarding to Marty Weber	1.00
	02/07/08	Emails regarding Affidavit of Walt Roper	0.20
	02/07/08	Revising Affidavit and forwarding to Marty Weber	0.80
	02/08/08	Evaluating and organizing file materials	1.00
	03/12/08	Evaluating and organizing file materials	1.00
	04/15/09	Scheduling and noticing depositions	2.00
	04/16/09	Making grids for documents and indexing documents produced by Defendants	4.00
	04/17/09	Indexing documents produced by Defendants	3.50
	04/20/09	Indexing documents produced by Defendants	7.00
	04/21/09	Indexing documents produced by Defendants	7.00
	04/28/09	Noticing Robert McAlister deposition	0.75
	04/29/09	Preparing Walt Roper for Cindy Weatherford depo - copies, indexes, etc.	2.00
	06/10/09	Finding depo quotes for memo to Christa Boyd re: Breach of Fiduciary Duty	1.75
	06/11/09	Finding depo quotes for memo to Christa Boyd re: Breach of Fiduciary Duty	0.75
	06/19/09	Editing Motion to Certify Breach of Fiduciary Duty Claims	2.70
	06/22/09	Editing Motion to Certify Breach of Fiduciary Duty claims	1.23333
	06/22/09	Performing Westcheck on Motion for Class Cert on Breach of Fiduciary Duty claims	2.38333
	06/23/09	Making edits to Motion to Certify Breach of Fiduciary Duty Claims	5.83333
	06/24/09	Working on Motion to Certify Breach of Fiduciary Duty Claims	6.36667

**The Roper Firm
Sterling Chemicals
Paralegal Time**

	Date	Description	Qty
	07/08/09	Editing Cast of Characters grid	0.41667
	07/10/09	Reading through pleadings for info to use in response to Motion for Summary Judgment	4.88333
	07/13/09	Reviewing pleadings for info for Motion for Summary Judgment response	0.86667
	07/16/09	Drafting Proposed Findings of Facts	1.86667
	07/17/09	Drafting Proposed Findings of Facts	2.58333
	07/17/09	Editing Plaintiffs' Reply to Sterling's Motion for Summary Judgment	2.93333
	07/20/09	Editing Response to Motion for Summary Judgment	5.56667
	07/21/09	Editing Reply to Defendants' response to motion for Breach of Fiduciary Duty certification	3.61667
	07/22/09	Working on Response to Defendants' Reply to Motion for Class Certification of Breach of Fiduciary Duty Claims & Findings of Fact	4.35
	07/23/09	Working on Response to Defendant's Reply to Motion for Certification on Breach of Fiduciary Duty and Findings of Fact	4.91667
	07/24/09	Editing Reply to Response to Motion for Class Certification on Breach of Fiduciary Duty Claims	2.31667
	08/03/09	Working on Proposed Findings of Fact	2.86667
	08/14/09	Finding information for Findings of Fact	1.06667
	08/17/09	Editing Findings of Fact	1.76667
	08/18/09	Editing Findings of Fact	3.01667
	08/27/09	Working on Exhibit List	6.75
	08/28/09	Working on Exhibits List	4.50
	08/31/09	Working on Exhibit Index	2.30
	09/03/09	Working on deposition cuts, exhibits list, and memorandum of law	6.80
	09/04/09	Working on pre-trial documents	6.53333
	09/08/09	Summarizing deposition of David Elkins	6.38333
	09/09/09	Putting together Authorities binder	5.55
	09/10/09	Summarizing deposition of Harold Hamilton	4.31667
	09/12/09	Summarizing deposition of Dennis Harthun	2.00
	09/12/09	Getting Walt Roper ready to go to Houston for trial	0.60
	09/14/09	Summarizing deposition of Bob Evans	6.28333
	09/15/09	Summarizing deposition of Bob Evans	4.26667
	10/22/09	Working on Dennis Harthun and Harold Hamilton Direct Examinations	3.30
	10/23/09	Working on Harold Hamilton Direct Examination	4.93333
	11/04/09	Working on Plaintiffs' Direct Examinations	2.10
	11/05/09	Working on Plaintiffs' Direct Examinations	2.61667
	11/06/09	Gathering documents regarding Wayne Parker	4.88333

The Roper Firm
Sterling Chemicals
Paralegal Time

	Date	Description	Qty
	11/30/11	Working on damage calculations	0.31667
	12/01/11	Calling class members to assess damages	1.11667
	12/01/11	Drafting discovery to Defendant	0.80
	12/02/11	Calling class members to assess damages	2.65
	12/05/11	Calling class members to discuss damages and working on damages spreadsheet	4.58333
	12/06/11	Talking to class members re: damages and working on damages spreadsheet	3.51667
	12/07/11	Working on damages grid and talking to class members	2.73333
	12/08/11	Working on damages spreadsheets	2.88333
	12/12/11	Working on Response to Motion for Protective Order	0.76667
	12/13/11	Talking to class members and working on damages spreadsheets	2.68333
	12/14/11	Working on damages grids	3.73333
	12/15/11	Calling class members and working on damages grids	2.31667
	12/19/11	Working on damages spreadsheets	0.81667
	12/20/11	Working on damages spreadsheets and settlement proposal	1.08333
	01/25/12	Working on Motion to Appoint Special Master	0.48333
	01/26/12	Working on Motion to Appoint Special Master	1.35
	02/01/12	Working on Motion to Appoint Special Master	0.38333
	02/10/12	Working on letter to send to class members transmitting discovery	0.93333
	02/14/12	Preparing and sending out letter to class members	1.50
	02/14/12	Working on documents for mediation	0.50
	02/15/12	Preparing for mediation	1.33333
	02/23/12	Taking calls from class members re: letter sent to them	0.65
	02/24/12	Returning call from class member re: letter	0.25
	03/19/12	Working on responses to Interrogatories and Requests for Production	0.48333
	03/20/12	Working on discovery responses - going through documents from class members	5.11667
	03/21/12	Working on discovery responses and going through documents from class members	3.96667
	03/22/12	Working on discovery responses	5.53333
	04/02/12	Gathering and emailing list of retirees that need to be contacted to Gloria Suarez at Crowley Norman	0.16667
	04/02/12	Drafting and filing Notice of Address Change	0.10
	04/03/12	Working on Motion and Order for Motion to Appoint Special Master and filing with Court	0.56667
	04/03/12	Sending email to Gloria Suarez at Crowley Norman re: calling class members about gathering damages info and talking to her on the phone re: same	0.80
	04/04/12	Calling class members re: damages documentation	0.70

The Roper Firm
Sterling Chemicals
Paralegal Time

	Date	Description	Qty
	04/05/12	Calling class members re: documentation of damages	0.10
	04/09/12	Calling class members re: damages document production	0.98333
	04/13/12	Putting together binder of damages research	0.20
	04/16/12	Preparing follow up letter to send to class members	0.91667
	04/17/12	Preparing letter to send to class members, doing mail merge and sending them out	1.10
	04/17/12	Reviewing and preparing/copying damages documents received from class members and making calls to class members	2.08333
	04/18/12	Calling class members re: damages documentation	0.45
	04/18/12	Working on supplemental responses to discovery	3.61667
	04/19/12	Working on supplemental discovery responses and going through documents received from class members	1.18333
	04/23/12	Talking to class members and preparing documents and supplemental discovery responses	4.40
	04/24/12	Talking to class members and working on damages documents received to supplement discovery	3.40
	04/25/12	Working on amended discovery responses and damages documents from class members	2.48333
	04/26/12	Research for Order on Motion to Appoint Special Master	0.46667
	04/26/12	Working on discovery responses from class members	0.35
	04/27/12	Working on discovery responses for class members	3.50
	05/03/12	Making edits to Order to Appoint Special Master	0.85
	05/08/12	Working on damages grid with Adam Reese's numbers	0.60
	05/16/12	Conference call with Special Master	1.00
	05/17/12	Emailing Adam Reese report and damages exhibits to David Axene	1.41667
	06/20/12	Working on Motion for Preliminary Approval of Settlement	0.56667
	06/21/12	Working on Motion for Preliminary Approval of Settlement	1.71667
	07/10/12	Editing Class Notice	1.18333
	07/11/12	Working on Bob Evans Declaration	0.90
	07/12/12	Working on Joint Motion to Amend Class Definition	1.15
	07/13/12	Working on Declarations of Bob Evans and Walt Roper	2.13333
	07/19/12	Working on class rep declarations	4.00
	07/20/12	Working on settlement documents	5.73333
	07/23/12	Working on Motion for Preliminary Approval of Settlement	2.95
	07/30/12	Reviewing Preliminary Approval Order and calculating deadlines	0.25
	07/30/12	Reviewing contact info for class members	0.41667
	08/07/12	Working on Motion for Attorneys Fees	4.10

**The Roper Firm
Sterling Chemicals
Paralegal Time**

	Date	Description	Qty
	08/09/12	Working on Motion for Attorneys Fees	3.90
	08/10/12	Working on Motion for Attorneys Fees	0.86667
	08/14/12	Calling class members who had sent in documents	1.65
	08/15/12	Talking to class members and mailing back their original documents	4.40
	08/16/12	Working on Motion for Attorneys Fees	3.50
	08/17/12	Working on Motion for Attorneys Fees	6.23333
	08/20/12	Working on Motion for Attorneys Fees	4.00
	08/21/12	Working on Declaration of Walt Roper in Support of Application for Attorneys' Fees	3.43333
	08/22/12	Working on Motion for Attorneys Fees	2.18333
	08/22/12	Talking calls from class members with questions about settlement.	0.30
	08/22/12	Working on Declaration of Walt Roper for Application for Attorneys' Fees	1.00
	08/23/12	Working on Motion for Attorneys Fees	1.11667
		Total Hours	368.76667

Exhibit C

**The Roper Firm
Sterling Chemicals
Expenses**

	Date	Source Name	Memo	Amount
Copies				
	05/01/2009	Eberstein & Witherite	5231	39.00
	07/10/2009	Eberstein & Witherite	5231	0.52
	01/14/2010	Eberstein & Witherite	5231 August	0.23
	06/22/2010	Eberstein & Witherite	5231 Mar	0.08
	03/01/2012	Eberstein & Witherite	5231	15.45
	04/17/2012	Sara Stevens	UPS Store Copies	24.26
Total Copies				79.54
Court Costs				
	04/20/2009	Cindy Weatherford	Witness Fee Sterling	40.00
	04/21/2009	Paul Vanderhaven	Witness Fee	72.00
	04/24/2009	Duces Tecum, Inc.	Federal Subpoena	65.00
	04/28/2009	Robert McAlister	Witness Fee	63.00
	05/29/2009	Complete Legal, Ltd.	Video Depo of Robert McAlister	1,592.50
	06/30/2009	Complete Legal, Ltd.	Video Depo of Cindy Weatherford	1,002.58
	02/20/2012	Crowley Norman LLP	Mediation	1,666.67
	03/02/2012	Crowley Norman LLP	Reimburse Overpmt for mediation/Crowley Normar	-500.00
Total Court Costs				4,001.75
Expert & Professional Fees				
	01/31/2012	Hay Group	5231-Sterling	6,002.27
	07/13/2012	Hay Group	Inv 395-52700; 395-52723	8,645.47
Total Expert & Professional Fees				14,647.74
Faxes				
	07/10/2009	Eberstein & Witherite	5231	3.10
	01/14/2010	Eberstein & Witherite	5231	0.60
Total Faxes				3.70
Miscellaneous Client				
	09/13/2009	Office Depot #120	Boxes & Easel	48.68
	11/13/2009	Omni Hotels Houston	Computer/Printer use	13.32
Total Miscellaneous Client				62.00
Postage & Delivery				
	05/01/2009	Eberstein & Witherite	5231	2.28

The Roper Firm
Sterling Chemicals

Date	Source Name	Expenses	Memo	Amount
03/01/2012	Eberstein & Witherite	5231		18.90
03/29/2012	Federal Express	Sterling		14.95
04/17/2012	Sara Stevens	Sterling		18.90
04/19/2012	Federal Express	Sterling		9.12
04/26/2012	Federal Express	Sterling		135.55
05/03/2012	Federal Express	Sterling		150.23
08/14/2012	5231-Sterling	Sterling Postage		47.59
08/16/2012	5231-Sterling	Sterling Postage		5.25
08/17/2012	5231-Sterling	Sterling Postage		5.60
Total Postage & Delivery				408.37
Process Service				
04/24/2009	Little Process Service	5231-Sterling		55.00
05/08/2009	North Texas PI	Process Service Fee		150.00
Total Process Service				205.00
Reference Materials				
07/06/2009	Pacer Service Center	2nd Qtr Research		14.32
12/03/2009	Pacer Service Center	5231		13.36
01/06/2010	Pacer Service Center	5231		18.16
04/07/2010	Pacer Service Center	5231		1.76
01/04/2012	Pacer Service Center	4th Quarter Research		21.28
04/03/2012	Pacer Service Center	1st Quarter Research		3.76
07/06/2012	Pacer Service Center	2nd Quarter Research		8.80
Total Reference Materials				81.44
Shared Expenses				
03/30/2010	Crowley Norman LLP	Sterling		9,452.59
Total Shared Expenses				9,452.59
Telephone Client				
07/06/2010	GAN Conferencing	Tele-Conference		13.58
11/01/2011	GAN Conferencing	Sterling Tele-Conference		24.44
01/01/2012	GAN Conferencing	Sterling Tele-Conference		29.98
02/01/2012	GAN Conferencing	Sterling Tele-Conference		6.90
03/01/2012	GAN Conferencing	Sterling Tele-Conference		25.94
04/01/2012	GAN Conferencing	Sterling Tele-Conference		24.35
05/01/2012	GAN Conferencing	Sterling Tele-Conference		6.34
06/01/2012	GAN Conferencing	Sterling Tele-Conference		24.83
07/01/2012	GAN Conferencing	Sterling Tele-Conference		10.98

The Roper Firm
Sterling Chemicals

Date	Source Name	Expenses	Memo	Amount
Total Telephone Client				167.34
Travel/Meals				
04/22/2009	Cafe Express #11201	Meals		41.84
04/28/2009	H and M Restaurants LI	5231-Meals		27.60
04/30/2009	Avis Rent-A-Car 1	Rental Car		114.99
04/30/2009	Shrimpbasketmilton	Meal		42.52
04/30/2009	Starbucks B9 S20511Qps	Meal		6.57
04/30/2009	Walt D. Roper	Parking		17.00
05/04/2009	Walt D. Roper	Mileage		21.72
05/13/2009	Walt D. Roper	Mileage		128.27
09/14/2009	Starbucks USA 00064Qps	Meals		3.84
09/15/2009	Jenni'S Noodle House -	Meal		51.88
09/15/2009	Le Peep Westheimer	Meal		28.27
09/16/2009	La Griglia - Houston	Meal		144.20
09/16/2009	Whataburger 418 Q26	Meal		10.81
09/16/2009	Murphy`S Deli	Meal		9.00
09/16/2009	Hotel Derek Houston	Hotel		407.88
09/16/2009	Walt D. Roper	Parking		18.00
09/17/2009	Chevron 0206761	Fuel		68.60
10/02/2009	Roper & Wood DDS, PC	Mileage to/from Houston		352.55
10/15/2009		Reimburse Fuel		-68.68
10/27/2009	Cafe Express-Mckinney Ave	Meals		39.13
11/09/2009	Murphy`S Deli	Meal		36.79
11/10/2009	Berryhill	Meals		26.00
11/10/2009	Murphy`S Deli	Meal		10.13
11/14/2009	7-Eleven 33121 Q05	Fuel for Rental Car		67.30
11/14/2009	Omni Hotels Houston	Hotel		973.67
11/14/2009	Omni Hotels Houston	Hotel		675.27
11/14/2009	Omni Hotels Houston	Hotel		30.23
11/20/2009	Walt D. Roper	Cab		27.00
11/20/2009	Walt D. Roper	Misc tips & parking		25.00
12/04/2009	Roper & Wood DDS, PC	Mileage to/from Houston		339.35
12/14/2009		Refund Travel		-67.30
12/18/2009	Bob Evans	Reimburse Hotel		1,703.90
12/18/2009	Relmond Hamilton	Reimburse Hotel		1,216.22
12/18/2009	Dennis Harthun	Reimburse Hotel		1,211.86
03/11/2010		Reimbursement Ck fm Robert Evans for personal c		-570.00
08/16/2011	Southwest Airlines	Airfare		25.00
08/31/2011	Praline connection	Meals		15.87

The Roper Firm
Sterling Chemicals

Date	Source Name	Expenses	Memo	Amount
08/31/2011	PJ's Coffee	Meals		7.43
08/31/2011	Walt D. Roper	Parking		14.00
08/31/2011	Walt D. Roper	Parking		14.00
09/01/2011	Walt D. Roper	Taxi		90.00
03/01/2012	Walt D. Roper	Parking for Mediation		16.00
Total Travel/Meals				<u>7,353.71</u>
Total Case Expenses				<u>36,463.18</u>
TOTAL				<u>36,463.18</u>

**The Cochran Firm-Dallas
Sterling Chemicals
Expenses**

	Date	Source Name	Memo	Amount
Contract Labor				
	02/13/2007	Hilary McAllister	Feb 2-12 hours	258.75
	04/10/2007	Hilary McAllister	March 21-April 2 hours	86.25
	04/24/2007	Hilary McAllister	April 4-17 hours	33.75
	05/29/2007	Hilary McAllister	May 14-25 hours	15.00
	07/24/2007	Hilary McAllister	July 9-20 hours	60.00
	09/21/2007	Hilary McAllister	Aug 30-Sept 21 Hours	258.75
	10/16/2007	Hilary McAllister	Sept 25-Oct 16 Hours	348.75
	11/14/2007	Alana Kalantzakis	5231-Sterling-Work from 11/1-11/14	262.50
	11/15/2007	Hilary McAllister	Oct 17-Nov 15 Hours	296.25
	12/14/2007	Alana Kalantzakis	5231-Sterling-Work from 11/19-12/14	108.75
	01/31/2008	Alana Kalantzakis	5231	206.25
	02/14/2008	Alana Kalantzakis	5231	243.75
	03/26/2008	Alana Kalantzakis	5231	135.00
	07/25/2008	Melissa Kidd	5231	<u>266.25</u>
Total Contract Labor				2,580.00
Depositions				
	03/14/2009	Elite Litigation Solutions, LLC	Depo of Carol VanRendalier	<u>442.05</u>
Total Depositions				442.05
Experts & Professional Fees				
	12/04/2007	Hay Group, Inc.	Retainer	5,000.00
	02/29/2008	Hay Group, Inc.	5231-Sterling	<u>7,117.50</u>
Total Experts & Professional Fees				12,117.50
Legal Research				
	03/20/2007	ChoicePoint Public Records, Inc.	Searches	22.50
	06/30/2007	5000-Firm	5231	5.20
	07/24/2007	Pacer Service Center	5231	5.20
	01/07/2008	Pacer Service Center	5231	9.28
	04/04/2008	Pacer Service Center	5231	11.60
	07/07/2008	Pacer Service Center	5231	0.88
	10/03/2008	Pacer Service Center	5231	0.80
	12/31/2008	Pacer Service Center	5231	4.88
	04/03/2009	Pacer Service Center	5231	<u>1.28</u>
Total Legal Research				61.62

The Cochran Firm-Dallas
Sterling Chemicals

	Date	Source Name	Expenses	Memo	Amount
Meals					
	12/04/2007	Longhorn Cafe		5231-Sterling Meals	51.08
	12/05/2007	Reef Restaurant		WDR & Client	229.97
	07/31/2008	MIKADOMIKADO	HOU	5231-Sterling Meals	24.62
	08/01/2008	PAPPAS BAR-B-Q #PAPPAS BA	HOU	5231-Sterling	13.68
	02/11/2009	Walt Roper		Dinner	<u>95.57</u>
Total Meals					414.92
Postage and Deliveries					
	02/20/2007	Federal Express		5231 delivery	22.48
	02/27/2007	Special Delivery Service, Inc.		Delivery	15.80
	05/22/2007	Federal Express		Delivery	10.38
	06/11/2007	Roper Pope LLP		Delivery	22.25
	06/19/2007	Sommerman & Quesada LLP		Feb postage	0.78
	06/19/2007	Sommerman & Quesada LLP		March postage	0.39
	06/25/2007	Sommerman & Quesada LLP		April postage	0.39
	09/14/2007	Special Delivery Service, Inc.		5231 delivery	18.30
	09/25/2007	Sommerman & Quesada LLP		July Postage	0.41
	09/29/2007	Sommerman & Quesada LLP		Aug Postage	1.16
	11/22/2007	Federal Express		5231-Sterling	37.44
	11/24/2007	Special Delivery Service, Inc.		5231	18.30
	02/14/2008	Federal Express		5231	23.60
	03/31/2008	Sommerman & Quesada LLP		January 2008 Costs	3.96
	04/03/2008	Federal Express		5231	10.40
	06/20/2008	Sommerman & Quesada LLP		5000-March 2008 Costs	6.78
	10/15/2008	Sommerman & Quesada LLP		June 2008 Costs	15.96
	10/15/2008	Sommerman & Quesada LLP		5000-July 2008 Costs	<u>9.60</u>
Total Postage and Deliveries					218.38
Printing and Reproduction					
	02/20/2007	The LDM Group, LLC		Copies	213.97
	05/29/2007	The LDM Group, LLC		Copies	665.85
	06/19/2007	Sommerman & Quesada LLP		Feb copies	2.50
	06/19/2007	Sommerman & Quesada LLP		March copies	0.50
	06/25/2007	Sommerman & Quesada LLP		April copies	0.20
	07/03/2007	Sommerman & Quesada LLP		May copies	0.10
	09/10/2007	The LDM Group, LLC		Litigation copies	279.62
	09/29/2007	Sommerman & Quesada LLP		Aug Copies	1.70
	11/13/2007	The LDM Group, LLC		Copying	75.60
	12/17/2007	Sommerman & Quesada LLP		5000-November Costs	2.80
	03/31/2008	Sommerman & Quesada LLP		January 2008 Costs	12.10

The Cochran Firm-Dallas
Sterling Chemicals

Date	Source Name	Expenses	Memo	Amount
04/02/2008	The McLarty Firm, P.C.			18.40
04/07/2008	Sommerman & Quesada LLP	5000-February 2008 Costs		1.90
06/20/2008	Sommerman & Quesada LLP	5000-March 2008 Costs		3.50
10/15/2008	Sommerman & Quesada LLP	June 2008 Costs		1.50
10/15/2008	Sommerman & Quesada LLP	5000-July 2008 Costs		1.70
02/11/2009	FedEx Kinko's	5231-Sterling		1.34
02/11/2009	FedEx Kinko's	5231-Sterling		94.10
04/30/2009	Sommerman & Quesada LLP	5000-January 2009 Costs		2.30
Total Printing and Reproduction				<u>1,379.68</u>
Process Service				
03/20/2007	Alan R. Davis	Sterling Chemicals service		<u>65.00</u>
Total Process Service				<u>65.00</u>
Travel				
12/10/2007	Hotel Icon	5231-Sterling Hotel		929.26
12/18/2007	Walt Roper	Trip to Houston for Depo		216.31
03/06/2008	Harold Hamilton	Reimburse Travel Expenses		638.98
03/06/2008	Robert Evans	Reimburse Travel Expenses		1,467.58
03/06/2008	Dennis Harthun	Reimburse Travel Expenses		614.79
05/30/2008	Southwest Airlines	Airfare to/from Dallas to Houston		256.00
06/02/2008	McDonald's	Meals		5.32
07/28/2008	Walt Roper	Parking		14.00
08/01/2008	DE-ALTIMATE TRANDE-ALTIMA 713	5231-Sterling Taxi		50.00
08/01/2008	Walt Roper	Parking		12.00
02/06/2009	Walt Roper	Parking		71.00
02/09/2009	American Airlines	5231-Sterling		15.00
02/09/2009	Hertz Rental Car	Rental Car		86.38
02/11/2009	Walt Roper	Taxi		48.10
02/12/2009	SMARTC CARTE 111SMARTC CA DAL	5231-Sterling		3.00
02/13/2009	AMERICAN AI 0012AMERICAN FLU	5231-Sterling		15.00
02/19/2009	CARMEL CAR SERVICARMEL CA 212	5231-Sterling		44.00
02/19/2009	SMARTC CARTE 111SMARTC CA DAL	5231-Sterling		3.00
Total Travel				<u>4,489.72</u>
Total Case Expense				<u>21,768.87</u>
TOTAL				<u>21,768.87</u>